

**CITIZENS' COMMISSION ON
JAIL VIOLENCE**

**SEVENTH REPORT
OF THE IMPLEMENTATION MONITOR**

RICHARD E. DROOYAN

JULY10, 2013

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I am pleased to submit to the Board of Supervisors my Seventh Report regarding the implementation of the recommendations set forth in the September 28, 2012 Report of the Citizens' Commission on Jail Violence (the "Commission").

BACKGROUND

Since submitting my Sixth Report to the Board of Supervisors on May 14, 2013, I have continued to monitor the efforts by the Los Angeles Sheriff's Department (the "Department") to implement the Commission's recommendations. In this most recent period, the Department continued to work with the Chief Executive's Office to finalize the plans for the Custody Division Training Bureau (to implement or further implement Commission recommendations 5.2, 5.3, 5.8 and 6.3). It has also provided additional support for its funding requests to the Chief Executive's Office for additional investigators for the Internal Affairs Bureau ("IAB") and the Internal Criminal Investigative Bureau ("ICIB") (Recommendations 7.1, 7.6, 7.9) and for seven Compliance Lieutenants (Recommendations 3.10, 7.8, 7.9). The CEO reports that it "has concluded its preliminary review of the[se] Department's request[s] and has asked for a more comprehensive proposal." The CEO "anticipate[s] a recommendation to the Board will be submitted within the next 60 days" from July 2, 2013.

During this period, the Department completed its proposal for a new Inspectional Services Command (Recommendation 4.12), which the Board's Consultants and I analyzed. I submitted this proposal to the CEO with our approval on June 7, 2013.

The Department also conducted an assessment of the operations staff for the East Facility in the Pitchess Detention Center to create a model for assessing the staffing needs of each of the eight jail facilities in response to the Commission's recommendation that "[m]anagement staff should be assigned and allocated based on the unique size and needs of each facility" (Recommendation 4.11). I provided feedback on the Operation Staffing Model to the Department, which is working on assessments for the other jail facilities.

The Department also submitted further support for its request for additional supervisors, which the Consultants and I have reviewed. We met with the Department this week to review the proposal in light of the additional information provided by the Department.

The Department also submitted a request to the Chief Executive's Office for funding for additional fixed Closed Circuit Television ("CCTV") cameras in the jail facilities in lieu of additional lapel cameras as recommended by the Commission. (Recommendation 7.15.) The CEO has asked the Consultants and me to evaluate the Department's request. The Consultants and I met with the Department to review the funding request for the additional fixed CCTV cameras and to request additional information.

Finally, during this period I worked with the Department to complete the revision to the Force Manual to make it clearer and easier for Department personnel to use. The revised Manual has now been approved by the Department and it will be published later this week. The revision of the Force Manual completes the Department's implementation of a number of the Commission's use of force and disciplinary recommendations.

As reflected in the summary chart set forth below, as of the date of this Report, the Department has implemented 37 of the Commission’s 60 recommendations¹ directed to the Department. It has partially implemented another 11 recommendations and is in the process of implementing another 12 recommendations. The Department has requested funding to implement fully 15 of the remaining 23 recommendations.²

Category	Implemented³	Partially Implemented⁴	In progress⁵	Total	Funding Request⁶
Use of Force	8	1	3	12	2
Management	11	0	3	14	2
Culture	5	3	0	8	3
Personnel/ Training	5	4	1	10	3
Discipline	7	3	5	15	5
Oversight	1	0	0	1	0
Total	37	11	12	60	15

¹ A more detailed breakdown of the status of the Department’s implementation of each recommendation is attached as Appendix 1 to this Report. A comparison reflecting the progress of the Department’s implementation of the recommendations is set forth in Appendix 2.

² The status of the Commission’s funding requests is attached as Appendix 3 and the status of the remaining recommendations is attached as Appendix 4.

³ “Implemented” means that the Department’s implementation of the recommendation has been reviewed and approved by the Monitor, and the reforms have been incorporated into jail operations.

⁴ “Partially Implemented” means that the Department has implemented the recommendation, but some additional steps are required to complete the implementation.

⁵ “In progress” means that the Department is assessing the policy, procedural and operation needs and/or is in the process of implementing the recommendation.

⁶ “Funding Request” means that the Department has submitted or anticipates submitting a funding request to implement additional Commission recommendations.

IMPLEMENTATION STATUS

CHAPTER 3: USE OF FORCE

On January 1, 2013, the Department promulgated a new Use of Force Policy (the “Force Policy”). Pursuant to the Commission’s recommendations, the Department distributed to each Deputy Sheriff and Custody Assistant a Use of Force Manual (the “Force Manual”) that includes pertinent provisions of the Department’s Manual of Policies and Procedures (the “MPP”), the Custody Division Manual, and the Court Services Manual relating to the use and reporting of force by Department personnel. On June 24, 2013, the Department approved a revised Force Manual, which will be published this week. The revised manual, which does not change the fundamental principles of the new Force Policy promulgated at the beginning of the year, is better organized, clearer, and will be easier to use. Department personnel are required to acknowledge that they have read and understand the new Force Policy, and 98% of the Department’s personnel have now received training in the fundamental principles of the policy.

The following summarizes the status of the Department’s implementation of each of the Commission’s specific Use of Force recommendations:

3.1. LASD should promulgate a comprehensive and easy-to-understand Use of Force Policy in a single document.

Implemented

The Department’s Use of Force policies are set forth in a single Force Manual (revised) that reflects (1) overall principles, including force prevention principles and an anti-harassment policy; (2) provisions providing guidance regarding use of force; (3) lists of approved weapons; and (4) requirements for the reporting of uses of force. The

revised manual is better organized, eliminates unnecessary provisions, is clearer, and should be easier for Department personnel to use.

3.2. LASD personnel should be required to formally acknowledge, in writing, that they have read and understand the Department's Use of Force Policy.

Implemented

The Department has created an Acknowledgement and Agreement Form that each Deputy Sheriff and Custody Assistant is required to sign.

3.3. All LASD personnel should be provided training on the new Use of Force Policy.

Implemented

The Department reports that over 98% of sworn personnel have received training in the new Use of Force Policy.

3.4. The Department's Use of Force Policy should reflect a commitment to the principles of the Force Prevention Policy and prohibit inmate retaliation or harassment.

Implemented

The MPP and the Custody Division Manual set forth the principles of the Force Prevention Policy, and the Custody Division Manual prohibits retaliation against, or harassment of, inmates. All of these sections are included in the Force Manual.

3.5. LASD's Use of Force Policy should be based upon the objectively reasonable standard rather than the Situational Use of Force Options Chart.

Implemented

Sections 3-10/020.00 and 3-10/030.00 of the MPP reflect the objectively reasonable standard, and references to the Situational Use of Force have been deleted in the revised Force Manual. Pursuant to the Consultants' recommendation, Section 3-02/035.05 of the Custody Division Manual includes references to the factors set forth by

the United States Supreme Court in *Hudson v. McMillian*, 503 U.S. 1 (1992) relating to the use of force in a custody setting.

3.6. The Use of Force Policy should articulate a strong preference for planned, supervised, and directed force.

Implemented

The Force Prevention Policy set forth in the MPP and the Custody Division Manual generally reflects a preference for planned, supervised, and directed force. In addition, the Department has added Section 3.02/035.10 to the Custody Division Manual, which reads as follows: “When force is required, every effort shall be made to plan, supervise, and direct force in an effort to control confrontations in a calm and professional manner.”

3.7. The Use of Force Policy should account for the special needs populations in the jails.

Implemented

The Department has added Section 3-02/035.15 to the Custody Division Manual, which reads as follows: “If a situation arises involving a special needs inmate, the appropriate mental health staff should be consulted, whenever possible, prior to the planned use of force.” In addition, there are provisions in the Force Manual relating to pregnant inmates and the Jail Mental Evaluation Team that further implement this recommendation.

3.8. PPI and FAST should be replaced with a single, reliable, and comprehensive data tracking system.

In progress (funding requested)

On March 28, 2013, the Department submitted a funding request to the Chief Executive’s Office for \$3.0 million to upgrade the Personnel Performance Index (“PPI”)

to “captur[e] inmate complaint information and satisfy current reporting requirements.” The request is under consideration by the Chief Executive’s Office, which is consulting with the Chief Information Officer.

The Department is also developing a Custody Automated Reporting and Tracking System (“CARTS”) that will be linked to PPI. CARTS will replace FAST and e-LOTS and all data entry for the Custody Division⁷ will be done in CARTS. Personnel data that is entered into CARTS will be exported automatically to PPI,⁸ and all personnel data will be retained only in PPI. As a result, the data in CARTS will be consistent with the data in PPI, and personnel data will be readily retrievable in a single database system.

The Department projects that a unified CARTS/ PPI system can be available in December 2014. This system will, as recommended by the Commission, “provide a single data tracking system for both statistical analysis and for monitoring employee performance [and] eliminate a source of inconsistent data on use of force.”

3.9. Inmate grievances should be tracked in PPI by the names of LASD personnel.

In progress

The Department reports that it has started to implement this recommendation and expects that it will be able to track inmate grievances in PPI by deputies’ and Custody Assistants’ names by September. In the interim, it is tracking the grievances in FAST, which can generate three different reports to track inmate grievances against individual deputies (and Custody Assistants).

⁷ Custody data entry includes, among other things, information about force incidents, force investigations, Administrative Investigations, inmate grievances and requests, complaint investigations, inmate assaults, inmate deaths, riots, escapes, and civil claims.

⁸ Personnel data includes, among other things, force incidents, personnel complaints, Administrative investigations, civil claims, and commendations.

3.10. LASD should analyze inmate grievances regarding the use of force incidents.

Partially implemented (funding requested)

The Department has established the position of Risk Management Lieutenant in the Custody Training Bureau to implement this recommendation to analyze inmate grievances at the Custody Division level. In addition, as noted below, the Department has established the position of Inmate Grievance Coordinator, who will review and analyze inmate grievances, including grievances regarding force. (*See Recommendation 7.14.*)

On March 28, 2013, the Department formally submitted a funding request to the Chief Executive's Office for seven Compliance Lieutenants (one for the North and South facilities and one each for the other six jail facilities) who will, among other things, be responsible for analyzing inmates grievances in the facility, along with tracking force investigations and conducting Administrative Investigations of Category 1 force incidents. (*See Recommendation 7.8.*)

On April 26, 2013, the Department responded to the CEO's request for additional information regarding the duties of the Compliance Lieutenants. On May 6, 2013, the Assistant Sheriff for Custody and her command staff met with the CEO's staff and provided a detailed list of the duties of the proposed Compliance Lieutenants. On June 28, 2013, the Department submitted a detailed Compliance Lieutenant Proposal to the CEO. The Department's funding request for the Compliance Lieutenants is under consideration by the CEO, which anticipates a recommendation to the Board by early September. (*See Recommendation 7.8.*)

3.11. Statistical data regarding use of force incidents needs to be vigilantly tracked and analyzed in real time by the highest levels of LASD management.

Implemented.

Department personnel have provided me with daily and monthly statistical reports and monthly force analysis used by Department managers to track and analyze use of force incidents in the jails.

3.12. Department should purchase additional body scanners.

In progress

The Department reports target dates the body scanners should be installed by mid-November.

CHAPTER 4: MANAGEMENT

The Sheriff has extensively re-organized the management of the Department. The Department now has four Assistant Sheriffs who are responsible for overseeing Custody Operations, Patrol Operations, Countywide Services, and Administration & Professional Standards, and who report directly to the Sheriff. Following the Commission's recommendation, the Sheriff appointed an Assistant Sheriff who is responsible for only the Department's Custody Operations. She recently reorganized the Custody Division into a Custody Services Division – General Population and a Custody Services Division – Specialized Programs under Chiefs who report directly to her. An Administrative Commander who has been responsible for the implementation of the Commission's recommendations also reports directly to her.

The Sheriff also has appointed a Chief of Staff and a Chief of a new Internal Investigations Division, who report directly to him. The Commander in charge of the new Inspectional Services Command also will report directly to the Sheriff. These steps

will help ensure the necessary accountability for the Custody Operations, the Internal Investigations Division, and the Inspectional Services Command.

Set forth below are summaries of the Department's implementation of each of the Commission's Management recommendations.

4.1. The Sheriff must be personally engaged in oversight of the jails.

Implemented

Since the formation of the Commander Management Task Force in October 2011, the Sheriff has been personally directing the reform of the jails. He has assured me that he intends to remain engaged in the oversight of the jails through regular communications with the new Assistant Sheriff for Custody Operations.

4.2. The Sheriff must hold his high level managers accountable for failing to address use of force problems in the jails.

In progress.

Since the Commission issued its report in September 2012, two managers who had responsibility for direct or indirect oversight of the jails during the time when many of the problems identified by the Commission occurred have retired, and the Undersheriff, who also had oversight responsibility for the jails at various times, has announced his retirement effective August 1, 2013. The Department reports that an Administrative Investigation remains on-going to determine if there is a basis for formal discipline against Department personnel. It now expects to complete the investigation by end of the month.

4.3. The Undersheriff should have no responsibility for Custody operations or the disciplinary system.

Implemented

In January, the Sheriff issued "Sheriff's Bulletin #593" entitled "Executive Reporting Procedures" to implement this recommendation. Under the reorganization, the Assistant Sheriff for Custody Operations reports directly to the Sheriff. IAB and ICIB now report to the Sheriff through the recently appointed Chief of the Internal Investigations Division. Further, as noted above, the Undersheriff has announced his retirement effective August 1, 2013.

4.4. The Department should create a new Assistant Sheriff for Custody position whose sole responsibility would be the management and oversight of the jails.

Implemented.

The Sheriff has appointed an Assistant Sheriff who is responsible for Custody Operations. She assumed her duties on March 18, 2013. Effective July 1, 2013, she reorganized the Custody Division into two Custody Services Divisions, one for General Population and one for Specialized Programs. Each of the Divisions is headed by a Chief who reports directly to the Assistant Sheriff for Custody Operations.

4.5. The Sheriff should appoint as the new Assistant Sheriff for Custody an individual with experience in managing a large corrections facility or running a corrections department.

Implemented.

The Sheriff interviewed the top tier candidates and appointed an Assistant Sheriff for Custody Operations who has extensive experience in running a corrections department.

4.6. The Assistant Sheriff for Custody should report directly to the Sheriff.

Implemented

“Sheriff’s Bulletin #593” entitled “Executive Reporting Procedures” provides that each of the Assistant Sheriffs, including the Assistant Sheriff for Custody Operations, reports directly to the Sheriff.

4.7. The Commander Management Task Force should not be a permanent part of Custody management.

Implemented

The Sheriff’s Bulletin #593 and the new organization charts do not include a role for the Commander Management Task Force in Custody management.

4.8. The Sheriff must regularly and vigilantly monitor the Department’s Use of Force in the jails.

Implemented

Since at least the formation of the Commander Management Task Force in October 2011, the Sheriff has been monitoring the level of force in the jails. Again, he has assured me that he intends to remain engaged in oversight of the jails through regular communications with the new Assistant Sheriff for Custody Operations.

4.9. The Department should implement SCIF [the Sheriff’s Critical Incident Forum] on the Custody side to improve the accountability of jail supervisors.

Implemented

This recommendation has been implemented pursuant to a Custody Division Directive, dated December 13, 2012, issued by the then Chief of the Custody Division. A Custody Division SCIF took place on February 12, 2013, to review statistics relating to the operations of the Custody Division.

4.10. Senior management needs to be more visible and engaged in Custody.

Implemented

The Department has amended the job descriptions in the Custody Division Manual so that they now require the Assistant Sheriff - Custody Division, the Custody Division Chiefs, the Area Commanders, and the Jail Captains to “maintain a visible presence within the [assigned] jail facilities to help ensure proper adherence to policy and the application of the Department’s Core Values.” Unit Commanders have advised me that they regularly walk through the jail facilities and senior management personnel have confirmed that they regularly visit the jail facilities.

4.11. Management should be assigned and allocated based on the unique size and needs of each facility.

In progress (funding request anticipated)

The Department is analyzing the operations staff of each of the jail facilities and anticipates needing additional funding. I have received, reviewed and commented on a draft of the analysis for the East facility that will provide the framework for the analysis of the remaining facilities. The Department expects that the facilities assessment will be completed by October 2013.

4.12. LASD should create an Internal Audit and Inspection Division.

In progress (funding requested)

I initially received from the Department organization charts along with position descriptions for the personnel who would be assigned to a new Inspectional Service Command (“ISC”) for the Department. The Consultants and I met with the Department personnel charged with the responsibility for organizing this new command to discuss the personnel needs of the command. In response, on February 15, 2013, the Department

submitted a comprehensive Inspectional Services Command Proposal that included an Implementation Plan, a Proposed Audit and Inspection Plan, and a Duties and Staffing Proposal. The Consultants and I recommended that the Department clarify the implementation plan and focus the initial audit plan on the critical issues in the Department to determine the personnel needs for such an audit plan.

On March 8, the Department submitted a revised Implementation Plan, which the Consultants and I reviewed. On May 2, the Consultants and I met with the Department staff who presented an Implementation Plan and Personnel & Budget Proposal for the Inspectional Service Command based upon the Department's analysis of existing departmental inspections, the work and resources of other police audit divisions,⁹ and an internal Risk Assessment Survey that identified and prioritized areas of concern. The Implementation Plan set forth the steps required for Audit Planning and Execution and for reviews by an Inspectional Review Panel, an 18-month timeline for creating the Inspectional Service Command in four phases, detailed organization charts showing the creation of the command in the four phases, objectives and expected outcomes for each phase.

On June 3, 2013, the Department presented its final proposal for the Inspectional Services Command, which the Consultants and I endorsed, and which I submitted to the CEO on June 7, 2013. On June 28, 2013, in response to the CEO's request for additional information, the Department submitted detailed Duty Statements and a Budget Request Worksheet for the Inspectional Service Command proposal directly to the CEO. The proposal is now under review by the CEO.

⁹ The department reviewed the internal audit divisions of the Los Angeles Police Department, the California Department of Corrections and Rehabilitation, and the California Highway Patrol.

4.13. The Department should have a formal policy to address campaign contributions.

Implemented

On January 31, 2013, the Department issued revised Section 3-01/070.05 (Political Activity) and Section 3-01/070.07 (Prohibited Political Activity and Other Conflicts of Interest) of the MPP.

4.14. LASD should participate in collaborations such as the Large Jail Network that would enable it to learn about best practices and approaches in other systems.

Implemented

Although the Department joined the Large Jail Network, the meeting that was supposed be held in Aurora, Colorado, on March 17 to 19, 2013, was cancelled due to sequestration. Five members of the Custody Division attended the American Jail Association National Training Conference in May.

CHAPTER 5: CULTURE

As noted in my earlier reports, the Department has emphasized respect for and communications with inmates through the Force Prevention Policy, the Education Based Incarceration program, and Town Hall meetings. It has enhanced the training of new Custody Division personnel in the principles of the Force Prevention Policy, ethics, and destructive cliques, and it has submitted to the Chief Executive's Office its proposal for a Custody Division Training Bureau that will provide additional training to current Custody deputies and Custody Assistants. It also has established a Dual Track Career Path that will provide deputies with an opportunity for a career in the Custody Division. The Department has also enhanced the penalty guidelines for dishonesty to further

address the culture problems identified by the Commission. Finally, each facility has developed a rotation policy taking into consideration its size, configuration, and inmate population.

Set forth below are summaries of the Department's implementation of each of the Commission's recommendations regarding the Department's culture in the Custody Division.

5.1. The Department must continue to implement reforms that emphasize respect for, engagement of, and communications with inmates.

Implemented

Based upon my conversations and meetings with the Sheriff and with members of the Command staff and Unit Commanders; my review of policies, directives, and reports; my tours of jail facilities; and input from the Consultants and outside observers, it is apparent that the Department is committed to implementing the reforms recommended by the Commission, enhancing respect for and communications with inmates, and changing the culture in the Custody Division. This is reflected in the principles set forth in the Force Prevention Policy, the Anti-harassment Policy, the Education Based Incarceration program, the numerous Town Hall meetings with inmates, the Department's responses to inmate grievances, and its progress in implementing the Commission's recommendations.

5.2. The Department's Force Prevention Policy should be stressed in Academy training and reiterated in continuing Custody Division training.

Partially implemented (funding requested)

This recommendation has been implemented for new deputies, and 98% of the existing staff has received training in the new Use of Force Policy, which incorporates

the Force Prevention Principles. What remains is setting up a formal training bureau in the Custody Division to enhance continuing training of the existing staff.

As discussed below under Recommendation 6.3, the Department is in the process of creating a Custody Division Training Bureau that will provide enhanced continuing training to current Custody personnel, supervisors, and Training Officers on all aspects of Custody Divisions operations, including the principles of the Force Prevention Policy.

5.3. The Department should enhance its ethics training and guidance in the Academy as well as in continuing Custody Division training.

Partially implemented (funding requested)

Academy training covers “Department Ethics and Standards,” including “CORE Values” and “Critical Decision Making” and the Jail Operations Continuum covers “Valued Communications” and “Value Based Decision Making.” Additional ethics training will be provided to the existing staff through the Custody Division Training Bureau the Department is creating. In the interim, the Department will roll-out blocks of training to enhance ethics training for the existing staff.

5.4. The Department must make Custody a valued and respected assignment and career.

Implemented

Sheriff’s Bulletin # 594, dated February 1, 2013, announced that the Department has established a Dual Track Career Path that allows new recruits to select a career in Custody and allows Deputy Sheriffs currently assigned to Custody to remain in Custody assignments. It also allows Deputy Sheriffs and supervisors to promote up to the position of Chief of the Custody Division without going out to a patrol assignment.

5.5. Senior leaders must be more visible in the jails.

Implemented.

The Department has amended the job descriptions in the Custody Division Manual so that they now require the Assistant Sheriff - Custody Division, the Custody Division Chief, the Area Commanders, and the Jail Captains to “maintain a visible presence within the [assigned] jail facilities to help ensure proper adherence to policy and the application of the Department’s Core Values.” (See Recommendation 4.11 above.)

5.6. LASD must have a firm policy and practice of zero tolerance for acts of dishonesty that is clearly communicated and enforced.

Implemented

New disciplinary guidelines were published on February 17, 2013, that enhanced the penalties for dishonesty.

5.7. The Department should have a sensible rotation policy to protect against the development of troubling cliques.

Implemented

As a result of my meetings with a Working Group formed by the Department, it was decided that, instead of a single rotation policy for the entire Custody Division, the Unit Commanders would develop their own rotation policies for each of the facilities. The policies would rotate deputies who regularly have contact with inmates, including deputies in “key positions,” among job assignments to address the Commission’s concern about deputy cliques, taking into consideration the facility’s size, configuration and inmate population to ensure the safety and security of the staff and inmates. Each of the

Unit Commanders has now issued a unit directive rotating deputies among job assignments in each facility.

5.8. LASD should discourage participation in destructive cliques.

Partially implemented (funding requested)

The subject of destructive cliques is covered for new Deputy Sheriffs in the Jail Operations Continuum. Additional training will be provided to other Custody personnel through the Custody Division Training Bureau that the Department is in the process of creating. Further, each of the jail facilities has a rotation policy that is intended to discourage participation in destructive cliques.

CHAPTER 6: PERSONNEL AND TRAINING

The Department has submitted to the Chief Executive's Office proposals to create a Custody Division Training Bureau that will develop a robust post-Academy training program for both new and existing personnel. After a number of discussions between the Department and the Chief Executive's Office to refine the Department's proposals in light of budget constraints, the CEO reports that it "has concluded its preliminary review of the Department's request and has asked for a more comprehensive proposal." The Department is in the process of responding to the CEO's request, and the CEO "anticipate[s] a recommendation to the Board will be submitted within the next 60 days" from July 2, 2013.

Under the directions of the Assistant Sheriff for Custody, the Department has conducted a comprehensive analysis of the Custody Division staffing and supervision to determine the number of additional supervisors it needs in each of the jail facilities. The Consultants asked for additional information from the Department to complete their

evaluation of the Department's requests, which the Department has now provided. The Consultants and I are scheduled to meet with the Department this week to review the proposal in light of the additional information. The Department has also frozen Deputy Sheriff positions to increase in the ratio of Custody Assistants to Deputy Sheriffs to achieve the agreed upon 65/35 ratio.

The Department's implementation of the Commission's specific Personnel and Training recommendations are set forth below.

6.1. The Department should review and revise its personnel and training procedures to reflect Custody's status as a valued and important part of the Department.

Partially implemented (funding requested)

The Dual Track Career Path was established on February 1, 2013. In addition, the Department has expanded its Custody training through the Jail Operation Continuum, and it is in the process of creating a Custody Division Training Bureau that will develop a comprehensive training program for the Custody Division.

6.2. The Department should develop and implement a long-range and steady hiring plan based upon normal attrition.

Implemented

A Sworn Vacancy Projection submitted by Personnel Administration to the Commander Management Task Force on October 2, 2012 reflects "a strategic plan to consistently hire deputies through 2017" to fill vacancies and hire additional deputies based upon normal attrition. It will be subject to the availability of the funding in the future to hire new deputies.

6.3. Deputies and supervisors should receive significantly more Custody specific training overseen by the Department's Leadership & Training Division.

Partially implemented (funding requested)

The Department has implemented this recommendation for new deputies and is in the process of implementing this recommendation for experienced deputies and supervisors. Consistent with the long-term goal of setting up a separate Custody Division (*see* Recommendation 6.10) and the Dual Track Career Path, the Department has proposed to enhance significantly the training of Custody Division personnel through the creation of a new Custody Division Training Bureau, which will oversee post-Academy training of Custody Division personnel.

As previously reported, the Consultants and I reviewed the Department's proposal for a new Custody Division Training Bureau, including organizational charts and position descriptions for the supervisors and Bonus Deputies who would be responsible for overseeing and conducting the post-Academy training for Custody personnel. After meetings and telephone conversations with the Department and the Consultants, the Department accepted the Consultants' assessment of the Department's operational needs and provided me with a new organization chart that reflects these assessments.

I submitted the new organization chart to the Chief Executive's Office and I had follow-up discussions with the Chief Executive's Office regarding the Department's staffing requests. The Department and the Chief Executive's Office have had further discussions to refine the Department's proposal in light of budget constraints, and the Department is in the process of responding to the CEO's request for additional information. The CEO anticipates that it will make a recommendation to the Board by the beginning of September.

The Department reports that it will begin staffing the bureau as soon as the funding request is approved by the Board and that it anticipates that it will complete the staffing in six months.

6.4. There should be a meaningful probation for new deputies in Custody.

Implemented

Effective January 11, 2013, Custody Division Directive 12-005 provides that “at the completion of the employee’s sixth month” of employment, the shift Lieutenant will be conducting “a thorough inquiry of the employee’s personnel performance.”

Thereafter, “three or four weeks prior to the employee’s one year anniversary the Unit Commander or designee shall conduct another personnel performance review and schedule a face to face meeting.” Before an employee can complete probation, the Unit Commander is supposed to “draft a memorandum to memorialize the employee’s successful completion of the probationary period.”

6.5. The number of supervisors to deputies should be increased and the administrative burdens on Custody supervisors should be minimized.

In progress (funding requested)

At the direction of the new Assistant Sheriff for the Custody Division, the Department has conducted a comprehensive review of the staffing and supervision in each of the jail facilities for each shift for each day of the week. It reports that based upon the budgeted “line staff,” which excludes operations, training and scheduling personnel, the current ratio of sergeants to bonus deputies, regular deputies, and Custody Assistants in the Custody Division is 1:22.05.¹⁰

¹⁰ Based upon the budgeted line staff as of April 7, 2013, there are 155 sergeants and 3617 sworn deputies and Custody Assistants.

On May 6, 2013, the Assistant Sheriff for the Custody Division and her staff met with the Chief Executive's Office and submitted a request for an additional 97 sergeant "items"¹¹ and two lieutenant items. The request was supported by a detailed analysis showing the current 7 day/24 hour staffing for each of the facilities and where each additional sergeant supervisor would be assigned by facility, location, day, and shift. If all of these requested positions are funded, it would give the Custody Division a 1:13.78 ratio of sergeants to deputies, bonus deputies, and Custody Assistants based upon the budgeted line staff.

I submitted the Department's request to the Consultants for their analysis. The Consultants requested additional information, which the Department provide last month. The Consultants and I met with the Department this week to review the Department's the additional information provided by the Department. The Department will finalize its propose to reflect the comments we provided at our meeting, and I anticipate that funding request for additional supervisors will be submitted to the CEO before the end of the month.

6.6. The Department should allow deputies to have a career in Custody and take steps in the interim to decrease the length of new deputy assignments to Custody.

Implemented

The Dual Track Career Path established on February 1, 2013, allows deputies to have a career in Custody and to promote from within the division.

¹¹ An "item" is the personnel needed to staff a position seven days a week.

6.7. The Department should utilize more Custody Assistants.

Partially implemented

The Department has received the approval to freeze 81 identified Deputy Sheriff positions, and it anticipates that it will achieve the 65/35 ratio provided in the Memorandum of Understandings with the Deputy Sheriffs' union ALADS and the Custody Assistants union PPOA by the end of July. The Department plans to conduct a needs assessment after it has had experience with the 65/35 ratio to determine which other positions currently staffed by Deputy Sheriffs can be handled by Custody Assistants without jeopardizing security and safety in the jails. Any change in the 65/35 ratio would be subject to a "meet and confer" obligation with ALADS.

6.8. Rotations within and among proximate facilities should be implemented.

Implemented

As discussed above (see Recommendation 5.7), the Department has implemented rotation policies in each of the facilities. It reports that it was not able to implement a voluntary rotation among the north county facilities, and that it would need the agreement of the deputies' union to implement rotations among the facilities. Beginning with the graduation of the next Academy class, however, it is planning to rotate newly assigned deputy sheriffs at the beginning of their fourth month of training to "a proximate facility" in the south or in the Pitchess Detention Center in the north so that all new deputies will have experience in more than one facility. This does not require agreement of the deputies' union to implement.

6.9. The Department's Mission Statement should be changed to reflect the importance of Custody.

Implemented

6.10. The Department should create a separate Custody Division with a professional workforce.

In progress

This is a long-term goal that the Department has begun to address. The Sheriff has selected a new Assistant Sheriff for the Custody Division and implemented the Dual Track Career Path on February 1, 2013. Establishing a Custody Division Training Bureau and increasing the ratio of Custody Assistants to Deputy Sheriffs will further implement this recommendation, but given the number of deputies who are hired each year, it will take several years before the Custody Division could be staffed exclusively with new deputies who want careers in Custody and all new deputies who want careers in patrol could go directly to patrol.

CHAPTER 7: DISCIPLINE

The Department is in the process of revamping its investigative and disciplinary system, which will increase the number of force investigations by the Internal Affairs Bureau. The Sheriff has created an Internal Investigations Division and appointed a Chief of the Division to oversee the Internal Affairs Bureau ("IAB") and the Internal Criminal Investigations Bureau ("ICIB"). The Department also has enhanced the penalties for dishonesty and excessive force, and the Custody Force Review Committee is rigorously reviewing Use of Force Packages. In addition, the Force Manual has now been revised to clarify the policies with respect to the review of videotaped footage and the separation of deputies involved in force incidents.

The Department has requested funding for additional resources for IAB and ICIB and for seven Compliance Lieutenants who would be assigned to each jail facility with one covering both the North and South facilities. The Chief Executive's Office reports that it has "concluded its preliminary review" of these requests. The Department has provided a detailed proposal for the Compliance Lieutenants and is in the process of completing a detailed proposal for additional IAB and ICIB resources. The CEO anticipated that "a recommendation to the Board will be submitted within the next sixty days" from July 2, 2013.

Set forth below are summaries of the Department's implementation of each of the Commission's Discipline recommendations.

7.1. The investigative and disciplinary system should be revamped.

In progress (funding requested)

The Department is in the process of implementing this recommendation. I have had a number of meetings with a Commander regarding this recommendation, and we have agreed on revamping the investigative system so that IAB conducts all Administrative Investigations of force incidents involving an actual injury to inmates (Category 2 and 3 force incidents) in addition to conducting the Force Investigations of all incidents involving serious injuries (Category 3 force incidents).

The Consultants and I have had a number of meetings and conversations with the Department to review their requests for additional resources for IAB and ICIB as well as the Internal Investigation Division headquarters and the Advocacy Unit that advises and represents the Department in connection with disciplinary matters. On May 2, 2013, I submitted a memorandum to the Chief Executive's Office setting forth an analysis of the

Department's requests and the Consultants' recommendations. The Department is in the process of preparing a detailed proposal for the CEO, which anticipates submitting its recommendation to the Board by the beginning of September.

7.2. The CFRC [Custody Force Review Committee] should monitor Force Packages for trends and concerns and the performance of supervisors.

Implemented

One of the Consultants attended CFRC meetings on “two different occasions and he watched the process of evaluation and follow-up related to the incidents involving several different force incidents.” He advised me that he was “impressed with the manner in which candid and direct examinations of Captains, Lieutenants, and Sergeants [who were] responsible for [the] force incidents takes place.” The CFRC assesses, among other things, “whether the force response was reasonable to the threat perceived” and “whether there may have been a force response of lesser magnitude more appropriate to the threat.” He further reports that “[i]n my experience, the establishment of standard and expectations by the executive management is the first step in changing a culture. The CFRC is clearly a big part of that proposition as it pertains to the use of force in the jails.”

I attended a CFRC meeting on March 13, 2013, and also was impressed with the depth of analysis and the way in which the CFRC holds the unit supervisors responsible for the quality of their force reviews.

- 7.3. Deputies should be required to provide a timely written report of force incidents and not be allowed to review video tape footage prior to the completion of that report or any interviews.**

Implemented

The revised Force Manual (Sections 3-10/100.00 and 3-10/115.00 of the MPP) sets forth these requirements.

- 7.4. Deputies involved in Significant Force incidents should be separated and not permitted to talk to each other until they have provided a written statement or have been interviewed by investigators.**

Implemented

The revised Force Manual (Section 3-10/110.00 of the MPP) sets forth this requirement.

- 7.5. IAB and ICIB should be part of an Investigation Division under a Chief who would report directly to the Sheriff.**

Implemented

The Department implemented this recommendation on March 1, 2013, effective March 3, 2013.

- 7.6. IAB should be appropriately valued and staffed by personnel that can effectively carry out the sensitive and important work of that bureau.**

Partially implemented (funding requested)

The Department has provided information showing that IAB investigators have often been promoted from IAB. The Department still needs to increase the number of IAB investigators. As noted above, the Department has submitted proposals to increase the staffing for the IAB and ICIB. (See Recommendation 7.1.)

7.7. The Disciplinary Guidelines should be revised to establish increased penalties for excessive force and dishonesty.

Implemented

The Department has implemented this recommendation by enhancing penalties for excessive force and dishonesty.

7.8. Each jail should have a Risk Manager to track and monitor use of force investigations.

In progress (funding requested)

The Department has submitted a request to the Chief Executive's Office for the funding of seven additional Compliance Lieutenant positions, and responded to a request for additional information. These Lieutenants would conduct Administrative Investigations of Category 1 Force Incidents, analyze inmate grievances regarding force in each facility, and monitor and track force investigations. As noted above, on June 28, 2013, the Department submitted a detailed proposal to the CEO, which anticipates submitting its recommendation to the Board by the beginning of September.

7.9. Force investigations should not be conducted by deputies' supervisors.

In progress (funding requested)

Under the revamped investigative system, if the Unit Commander determines that a use of force may have violated Department policy or involved misconduct, the Administrative Investigation of a Category 2 Force Incident (involving injuries to inmates) will be conducted by the Internal Affairs Bureau and the Administrative Investigation of a Category 1 Force Incident (no injury) will be conducted by the Compliance Lieutenants who will not be supervising any of the deputies.

7.10. Captains should not reduce charges or hold penalties in abeyance for use of force, dishonesty, or failure to report force incidents.

Partially implemented

The Department's penalty guidelines effective February 17, 2013, require suspension days (that is, penalties without pay), and preclude Education Based Discipline (that is, holding suspension days in abeyance), for dishonesty, excessive use of force, or failure to report force. The Department has developed a management protocol that will require compliance by Captains prior to modifying the charges and/or discipline for dishonesty, excessive force, or failure to report force. The Department is in the process of meeting with the employees' unions about the proposed management protocol.

7.11. The Department should vigorously investigate and discipline off-duty misconduct.

Implemented

The Department has provided me with a report of the results of investigations and the discipline imposed for off-duty misconduct from the beginning of the second quarter of 2011 through the end of the second quarter of 2012, which confirms that this recommendation has been implemented.

7.12. The Department should implement an enhanced and comprehensive system to track force reviews and investigations.

Implemented

The Department has demonstrated for me that the Electronic Line Operations Tracking System (e-LOTS) is a comprehensive system that can be used to track force reviews and investigations. It has now implemented a policy that requires all custody facilities to use e-LOTS to track Use of Force packages. Each Unit Commander is required to "ensure that all necessary information about each force incident [is] entered

into e-LOTS prior to the end of the shift in which the incident occurred,” and the Unit Commander or Operations Lieutenant is required to track in e-LOTS on a weekly basis all force reviews and contact the appropriate supervisor “if the preparation or review of the Force Package is overdue.” Eventually, e-LOTS will be replaced by CARTS, which will be used to track force reviews and investigations.

7.13. Inmate Complaints should be tracked by deputies’ names in PPI.

In progress

The Department now anticipates that it will be able to track inmate grievances by deputies’ names in PPI by September 2013. As noted above, in the interim the Department is tracking the grievances by deputies’ names in FAST.

7.14. The inmate grievance process should be improved and include added checks and oversight.

Partially Implemented

The Department is working to enhance the inmate grievance process, including a system for inmates to submit grievances on IPADS and for tracking electronically the Department’s handling of the grievances.

The Department has amended its policies to require Unit Commanders to review all personnel complaints and all complaints of retaliation. Complaints of retaliation are to be forwarded to Custody Division headquarters and the Office of Independent Review, and reviewed by a commander at the direction of the Chief of the Division and forwarded to the appropriate unit to handle. All allegations of retaliation are to be entered into the FAST system.

The Department had appointed an Inmate Grievance Coordinator at the rank of lieutenant who will oversee the Department’s handling of inmate complaints. The

Coordinator will conduct monthly reviews of all units within the Custody Division to ensure compliance with the Department's policies and procedures regarding inmate requests for service and personnel complaints. The Unit Commanders will respond to any findings of irregularities and the Coordinator will report his or her findings to the Division's Risk Management Lieutenant and senior management.

The Department also intends to audit the inmate grievance system twice a year by Custody Division Commanders and once a year as part of the Command Inspections under the direction of the Division Chief.

The Department is developing a pilot program whereby inmates will have access to IPADS to submit their requests for service and personnel complaints to the Department electronically. The request/grievance will be routed to the personnel assigned the responsibility for responding (for example, in the case of a grievance against a deputy, it would automatically go to the deputy's supervisor), and there would be a universal tracking system. The Department will also be able to run exception reports to determine if the service requests have been fulfilled or the grievances investigated and addressed, and it will be able to track grievances (and types of grievance) by deputy. The Department has the funding for the pilot program, which is a 90 day proof of concept that it is planning to test on a cell module and a trustee dorm in Men's Central Jail beginning in October. If successful and funding is available, the Department intends to implement the system Division-wide possibly within 14 months thereafter.

7.15. The use of lapel cameras as an investigative tool should be broadened.

In progress

In response to the recommendation of the Board of Supervisors, and also the Commission's encouragement, the Department "conducted a test and evaluation of representative forms of PVRDs ["Personal Video Recording Devices"] within MCJ and TTCF in order to assess the feasibility of implementing a larger scale deployment of PVRD technology at LASD." The Department's report "recommends a deployment of PVRDs exclusively at Men's Central Jail due to its prominence, historically higher liability operation, hazardous inmate classifications and overall impact such a deployment would have on the entirety of the Department." Taking into consideration the considerable potential costs, the Department recommends an initial deployment that is "manageable in size, scalable in scope and should necessitate a minimal need for additional infrastructure upgrades." The Report also identifies several issues that still need to be addressed in the development and implementation of a PVRD policy, including working with the unions to gain acceptance of the use of the technology, whether it is a voluntary or mandatory program, and "cost model and options for network infrastructure versus cloud storage solutions." Ultimately, the Department believes that the funds for lapel cameras would be better spent on additional fixed cameras in the jail facilities.

The Department has submitted to the CEO a request for funding for additional fixed CCTV cameras to "enhance[] the system at MCJ, TTCF, and IRC, as well as to expand it to all of the other custody facilities." This proposal is essentially in lieu of additional lapel cameras because the "Department believes that the risk of investing in a

technology that is rapidly evolving would likely mean that whatever product is purchased may be outdated before it is even deployed.” The CEO has asked the Consultants and me to evaluate the Department’s request. We met with the Department this week and asked for additional details concerning the funding request for additional CCTV cameras. In addition, I have asked the Consultants to evaluate whether the Department should still seek funding for an initial deployment of lapel cameras.

CHAPTER 8: OVERSIGHT

8.2. The Department should report regularly to the Board of Supervisors on use of force and the status of Custody recommendations.

Implemented

Since the formation of the Commander Management Task force in October 2011, the Sheriff has regularly reported to the Board on the use of force in the jails and the implementation of the Commission’s recommendations.

CONCLUSION

The Sheriff and the Department have continued to fully cooperate with me and work with the CEO towards implementation of the remaining recommendations that involve resource allocations and funding decisions. The remaining recommendations that do not require funding should be completed by the end of the year, if not sooner. Similarly, the Department should be able to implement the Commission’s recommendations for the Custody Training Bureau, additional IAB and ICIB investigators, and Compliance Lieutenants (facility risk managers) by the end of the year if the CEO recommends funding for these requests to the Board by the beginning of September.

Appendix 1

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
APRIL 2013 STATUS REPORT**

NO.	RECOMMENDATION	IMPLEMENTATION STATUS				COMMENTS
		IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	
USE OF FORCE	3.1 Comprehensive and easy-to-understand Use of Force policy in single manual	X				LASD implemented January 1, 2013. Manual revised June 24, 2013
	3.2 LASD personnel should be required to read and understand the new UOF policy	X				LASD implemented January 1, 2013.
	3.3 LASD personnel should receive training on the new UOF policy	X				On-going
	3.4 The Use of Force policy should reflect Force Prevention and anti-retaliation policies	X				LASD implemented January 1, 2013. Manual revised June 24, 2013
	3.5 The Use of Force policy should be based upon objectively reasonable standard	X				LASD implemented January 1, 2013. Manual revised June 24, 2013.
	3.6 The Use of Force policy should reflect preference for planned, supervised, and directed force	X				Manual revised June 24, 2013
	3.7 The Use of Force policy should account for special needs populations	X				LASD implemented January 1, 2013. Manual revised June 24, 2013
	3.8 LASD should have a single, reliable and comprehensive data tracking system			X		Funding request for PPI submitted by LASD; Upgraded PPI with CARTS by December 2014
	3.9 Inmate grievances should be tracked in PPI by names of LASD personnel			X		Estimated completion date of September 2013.
	3.10 LASD should analyze inmate grievances regarding use of force incidents		X			Implemented at Division level. Compliance Lieutenants requested to implement at Unit level.
	3.11 Use of force statistical data must be tracked and analyzed in real time by management	X				On-going
	3.12 LASD should purchase additional body scanners			X		Installation November 2013
12 USE OF FORCE RECOMMENDATIONS:		8	1	3	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
APRIL 2013 STATUS REPORT**

NO.	RECOMMENDATION					COMMENTS
		IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	
MANAGEMENT	4.1 Personal engagement by Sheriff in oversight of jails	X				On-going
	4.2 High level managers must be accountable for failing to address use of force problems			X		Administrative investigations on-going.
	4.3 The Undersheriff should not have any responsibility for custody or discipline	X				Sheriff's Bulletin issued (January 7, 2013)
	4.4 LASD should create a new Assistant Sheriff position for Custody	X				New Assistant Sheriff for Custody appointed.
	4.5 The Sheriff should appoint a new Custody Assistant Sheriff with corrections experience	X				New Assistant Sheriff for Custody appointed.
	4.6 The Custody Assistant Sheriff should report directly to the Sheriff	X				Sheriff's Bulletin issued (January 7, 2013)
	4.7 The Commander Management Task Force should not be a part of Custody management	X				Sheriff's Bulletin issued (January 7, 2013)
	4.8 The Sheriff must monitor the use of force in the jails	X				On-going
	4.9 LASD should utilize the Sheriff's Critical Incident Forum (SCIF) in Custody	X				December 13, 2012. Custody Division Directive.
	4.10 Senior management must be more visible in the jails	X				Position description amended.
	4.11 Operations support should be allocated based unique needs of each facility			X		Facilities assessment expected October 2013. Funding requested.
	4.12 LASD should created an Internal Audit and Inspection Division under a single Chief			X		Implementation plan developed and submitted to CEO. Funding requested
	4.13 LASD should have a policy regarding campaign contributions	X				Implemented January 31, 2013
	4.14 LASD should participate in the Large Jail Network	X				Attended May meeting
14 MANAGEMENT RECOMMENDATIONS:		11	0	3	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
APRIL 2013 STATUS REPORT**

NO.	RECOMMENDATION					COMMENTS
		IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	
5.1	LASD must emphasize respect for, and communications with, inmates	X				On-going
5.2	Force prevention policy should be stressed in Academy and Custody Division training		X			On-going for new deputies; in progress for existing staff
5.3	Ethics training should be enhanced in Academy and Custody Division training		X			On-going for new deputies; in progress for existing staff
5.4	Custody should be a valued and respected assignment and career	X				Dual track implemented February 1, 2013.
5.5	Senior leaders must be more visible in the jails	X				Position description amended.
5.6	LASD must have a zero tolerance policy for acts of dishonesty	X				Revised Guidelines effective 2/17
5.7	LASD should have a sensible rotation policy	X				Rotation implemented at unit level
5.8	LASD should discourage participation in cliques		X			On-going for new deputies; in progress for existing staff
8 CULTURE RECOMMENDATIONS:		5	3	0	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
APRIL 2013 STATUS REPORT**

NO.	RECOMMENDATION	IMPLEMENTATION STATUS				COMMENTS	
		IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)		
PERSONNEL AND TRAINING	6.1	LASD should revise its policies to reflect Custody's importance to Department		X			Dual track implemented February 1, 2013; Custody Training Bureau in progress.
	6.2	LASD should develop and implement a long-range and steady hiring plan	X				October 2, 2012 Sworn Hiring Projection Through 2017. Subject to funding.
	6.3	Custody personnel should receive significantly more Custody-specific training		X			Expanded Jail Operations and facility training for new deputies. Funding requested for Custody Training Bureau.
	6.4	There should be a meaningful probationary period for Custody deputies	X				January 9, 2013 Probationary Period Memorandum.
	6.5	LASD should increase the number of Custody supervisors			X		Department's analysis completed. Funding requested
	6.6	LASD should provide for careers in custody	X				Dual track implemented February 1, 2013.
	6.7	LASD should utilize more custody assistants		X			81 positions frozen to achieve 65/35 ratio. Long term: complete assessment after achieving 65/35 ratio. Meet and confer issue.
	6.8	LASD should implement rotations within and among proximate facilities	X				
	6.9	LASD should change its Mission Statement to reflect importance of Custody	X				
	6.10	LASD should create a separate Custody Division		X			Short term: Dual track implemented February 1, 2013.
10 PERSONNEL & TRAINING RECOMMENDATIONS:		5	4	1	0		

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
APRIL 2013 STATUS REPORT**

NO.	RECOMMENDATION	IMPLEMENTATION STATUS				COMMENTS
		IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	
7.1	The investigative and disciplinary system should be revamped			X		Funding requested
7.2	The CFRC should monitor force packages	X				Risk Management Lieutenant also designated to monitor force packages
7.3	Preclude deputies from reviewing videos before reporting use of force	X				LASD implemented January 1, 2013. Manual revised June 24, 2013.
7.4	Separate deputies involved in significant use of force incidents	X				LASD implemented January 1, 2013. Manual revised June 24, 2013.
7.5	Internal Affairs and ICIB should be enhanced and re-organized under a Chief	X				Implemented March 1, 2013
7.6	IAB should be appropriately valued		X			Promotions for IAB personnel. Funding requested for additional IAB positions.
7.7	There should be enhanced penalties for excessive force and dishonesty	X				Revised Guidelines 2/17
7.8	There should be a Risk Manager assigned to each custody facility			X		Funding requested
7.9	Force investigations should not be conducted by deputies' supervisors			X		
7.10	Use of force and dishonesty charges should not be reduced or held in abeyance		X			Revised Guidelines 2/17
7.11	LASD should vigorously investigate and discipline off-duty misconduct	X				On-going
7.12	LASD should have an enhanced system to track force investigations	X				Implemented policy to use e-LOTS.
7.13	Inmate use of force complaints should be tracked in PPI			X		Short-term: Tracked in FAST. Sept 2013: Tracked in PPI
7.14	LASD should improve the inmate grievance process		X			Inmate grievance coordinator appointed. Developing pilot to electronically process and track grievances
7.15	Increased use of Lapel Cameras			X		Short-term: Pilot program. Funding requested
15 DISCIPLINE RECOMMENDATIONS:		7	3	5	0	

DISCIPLINE

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
APRIL 2013 STATUS REPORT**

NO.	RECOMMENDATION	IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	COMMENTS
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OVERSIGHT	8.2 The Sheriff should regularly report to the Board of Supervisors	X				On-going
	1 OVERSIGHT RECOMMENDATION:	1	0	0	0	

TOTAL CCJV RECOMMENDATIONS	37	11	12	0
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**IMPLEMENTATION OF CCJV RECOMMENDATIONS
APRIL 2013 STATUS REPORT**

CCJV CATEGORY	IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	TOTAL
USE OF FORCE	8	1	3	0	12
MANAGEMENT	11	0	3	0	14
CULTURE	5	3	0	0	8
PERSONNEL AND TRAINING	5	4	1	0	10
DISCIPLINE	7	3	5	0	15
OVERSIGHT	1	0	0	0	1
TOTAL SHERIFF RESPONSIBLE CCJV RECOMMENDATIONS	37	11	12	0	60

DEFINITIONS	
<i>IMPLEMENTED (I)</i>	The Department's implementation has been reviewed and approved by the Monitor, and reforms have been incorporated into operations.
<i>PARTIAL (P)</i>	The Department has implemented the recommendation, but some additional steps are required to complete the implementation.
<i>IN PROGRESS (IP)</i>	The Department is assessing policy, procedural, and operational needs and/or is in process of implementing recommendation.
<i>NOT STARTED (NS)</i>	The Department has not initiated, or just started the development of, an implementation plan.

Appendix 2

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

		2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report
USE OF FORCE	3.1 Comprehensive and easy-to-understand Use of Force policy in single manual	Partial	NC	NC	NC	NC	Implemented
	3.2 LASD personnel should be required to read and understand the new UOF policy	Implemented	NC	NC	NC	NC	NC
	3.3 LASD personnel should receive training on the new UOF policy	Implemented	NC	NC	NC	NC	NC
	3.4 The Use of Force policy should reflect Force Prevention and anti-retaliation policies	Implemented	NC	NC	NC	NC	NC
	3.5 The Use of Force policy should be based upon objectively reasonable standard	Partial	NC	NC	NC	NC	Implemented
	3.6 The Use of Force policy should reflect preference for planned, supervised, and directed force	Partial	NC	NC	NC	NC	Implemented
	3.7 The Use of Force policy should account for special needs populations	Partial	NC	NC	NC	NC	Implemented
	3.8 LASD should have a single, reliable and comprehensive data tracking system	Not started	NC	NC	In progress	NC	NC
	3.9 Inmate grievances should be tracked in PPI by names of LASD personnel	In progress	NC	NC	NC	NC	NC
	3.10 LASD should analyze inmate grievances regarding use of force incidents	Partial	NC	NC	NC	NC	NC
	3.11 Use of force statistical data must be tracked and analyzed in real time by management	Implemented	NC	NC	NC	NC	NC
	3.12 LASD should purchase additional body scanners	In progress	NC	NC	NC	NC	NC

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

NO.	RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report
4.1	Personal engagement by Sheriff in oversight of jails	Implemented	NC	NC	NC	NC	NC
4.2	High level managers must be accountable for failing to address use of force problems	In progress	NC	NC	NC	NC	NC
4.3	The Undersheriff should not have any responsibility for custody or discipline	Implemented	NC	NC	NC	NC	NC
4.4	LASD should create a new Assistant Sheriff position for Custody	In progress	Implemented	NC	NC	NC	NC
4.5	The Sheriff should appoint a new Custody Assistant Sheriff with corrections experience	In progress	Implemented	NC	NC	NC	NC
4.6	The Custody Assistant Sheriff should report directly to the Sheriff	Implemented	NC	NC	NC	NC	NC
4.7	The Commander Management Task Force should not be a part of Custody management	Implemented	NC	NC	NC	NC	NC
4.8	The Sheriff must monitor the use of force in the jails	Implemented	NC	NC	NC	NC	NC
4.9	LASD should utilize the Sheriff's Critical Incident Forum (SCIF) in Custody	Implemented	NC	NC	NC	NC	NC
4.10	Senior management must be more visible in the jails	Implemented	NC	NC	NC	NC	NC
4.11	Operations support should be allocated based unique needs of each facility	In progress	NC	NC	NC	NC	NC
4.12	LASD should created an Internal Audit and Inspection Division under a single Chief	In progress	NC	NC	NC	NC	NC
4.13	LASD should have a policy regarding campaign contributions	In progress	Implemented	NC	NC	NC	NC
4.14	LASD should participate in the Large Jail Network	Implemented	NC	NC	NC	NC	NC

MANAGEMENT

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

NO.	RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report
CULTURE	5.1 LASD must emphasize respect for, and communications with, inmates	Implemented	NC	NC	NC	NC	NC
	5.2 Force prevention policy should be stressed in Academy and Custody Division training	Partial	NC	NC	NC	NC	NC
	5.3 Ethics training should be enhanced in Academy and Custody Division training	Partial	NC	NC	NC	NC	NC
	5.4 Custody should be a valued and respected assignment and career	In progress	Implemented	NC	NC	NC	NC
	5.5 Senior leaders must be more visible in the jails	Implemented	NC	NC	NC	NC	NC
	5.6 LASD must have a zero tolerance policy for acts of dishonesty	In progress	NC	Implemented	NC	NC	NC
	5.7 LASD should have a sensible rotation policy	In progress	Partial	NC	Implemented	NC	NC
	5.8 LASD should discourage participation in cliques	Partial	NC	NC	NC	NC	NC

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

		NO.	RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report
PERSONNEL AND TRAINING	6.1	LASD should revise its policies to reflect Custody's importance to Department	In progress	Partial	NC	NC	NC	NC	NC
	6.2	LASD should develop and implement a long-range and steady hiring plan	Implemented	NC	NC	NC	NC	NC	NC
	6.3	Custody personnel should receive significantly more Custody-specific training	Partial	NC	NC	NC	NC	NC	NC
	6.4	There should be a meaningful probationary period for Custody deputies	Implemented	NC	NC	NC	NC	NC	NC
	6.5	LASD should increase the number of Custody supervisors	Not started	NC	NC	In progress	NC	NC	NC
	6.6	LASD should provide for careers in custody	In progress	Implemented	NC	NC	NC	NC	NC
	6.7	LASD should utilize more custody assistants	In progress	NC	NC	NC	Partial	NC	NC
	6.8	LASD should implement rotations within and among proximate facilities	In progress	Partial	NC	Implemented	NC	NC	NC
	6.9	LASD should change its Mission Statement to reflect importance of Custody	Implemented	NC	NC	NC	NC	NC	NC
	6.10	LASD should create a separate Custody Division	In progress	Partial	NC	NC	NC	NC	NC

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

	NO.	RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report
DISCIPLINE	7.1	The investigative and disciplinary system should be revamped	In progress	NC	NC	NC	NC	NC
	7.2	The CFRC should monitor force packages	Implemented	NC	NC	NC	NC	NC
	7.3	Preclude deputies from reviewing videos before reporting use of force	Partial	NC	NC	NC	NC	Implemented
	7.4	Separate deputies involved in significant use of force incidents	Partial	NC	NC	NC	NC	Implemented
	7.5	Internal Affairs and ICIB should be enhanced and re-organized under a Chief	In progress	NC	Implemented	NC	NC	NC
	7.6	IAB should be appropriately valued	In progress	Partial	NC	NC	NC	NC
	7.7	There should be enhanced penalties for excessive force and dishonesty	In progress	NC	Implemented	NC	NC	NC
	7.8	There should be a Risk Manager assigned to each custody facility	In progress	NC	NC	NC	NC	NC
	7.9	Force investigations should not be conducted by deputies' supervisors	In progress	NC	NC	NC	NC	NC
	7.10	Use of force and dishonesty charges should not be reduced or held in abeyance	In progress	NC	Partial	NC	NC	NC
	7.11	LASD should vigorously investigate and discipline off-duty misconduct	Implemented	NC	NC	NC	NC	NC
	7.12	LASD should have an enhanced system to track force investigations	In progress	NC	NC	Implemented	NC	NC
	7.13	Inmate use of force complaints should be tracked in PPI	In progress	NC	NC	NC	NC	NC
	7.14	LASD should improve the inmate grievance process	In progress	NC	NC	NC	Partial	NC
	7.15	Increased use of Lapel Cameras	In progress	NC	NC	NC	NC	NC
OVERSIGHT	8.2	The Sheriff should regularly report to the Board of Supervisors	Implemented	NC	NC	NC	NC	NC

Appendix 3

STATUS OF DEPARTMENT FUNDING REQUESTS

NO.	RECOMMENDATION	STATUS	TARGET DATES
3.8	LASD should have a single, reliable and comprehensive data tracking system.	Department submitted preliminary proposal. CEO working with Department to develop comprehensive package.	Completion of upgraded PPI integrated with CARTS projected for December 2014.
4.11	Operations support should be allocated based upon the unique needs of each facility.	Under review by Department.	Assessment expected by October 2013
4.12	LASD should create an Internal Audit and Inspections Division under a single Chief.	Implementation Plan developed by Department, reviewed by Consultants and Monitor, and submitted to CEO. Under review by CEO.	
6.3	Custody personnel should receive significantly more Custody-specific training.	Department's request reviewed by Monitor and Consultants. CEO completed preliminary review.	Funding anticipated after September 1, 2013.
6.5	LASD should increase the number of Custody supervisors.	Department's assessment complete and under review by Monitor and Consultants.	
7.5	Internal Affairs and ICIB should be enhanced and reorganized under a Chief.	Department's assessment reviewed by Monitor and Consultants and submitted to CEO. CEO completed preliminary review..	Funding anticipated after September 1, 2013.
7.8	There should be risk manager assigned to each custody facility.	Department's request for 7 Compliance Lieutenants reviewed by Monitor and Consultants and submitted to CEO. CEO completed preliminary review.	Funding anticipated after September 1, 2013.

Appendix 4

REMAINING RECOMMENDATIONS

Number	Recommendation	Funding	Status
3.8	Replace PPI and FAST	Yes	Funding request submitted to CEO
3.9	Tracking of Inmate Grievances in PPI	No	Complete by 9/30/13
3.10	Analyze Inmate Use of Force Grievances	Yes	See 7.8
3.12	Additional Body Scanners	No	Complete by 12/31/13
4.2	Hold Managers Accountable	No	Complete by 7/31/13
4.11	Allocation of Facilities Operations Resources	Yes	Assessment by 10/31/13; funding request anticipated
4.12	Internal Audit and Inspections Division	Yes	Inspectional Service Command proposal submitted to CEO
5.2	Force Prevention Policy training	Yes	See 6.3
5.3	Enhanced Ethics training	Yes	See 6.3
5.8	Discourage Cliques	Yes	See 6.3
6.1	Enhance status of Custody	Yes	See 6.3
6.3	Enhance Custody Division Training	Yes	Custody Division Training Bureau proposal reviewed by CEO
6.5	Additional Supervisors	Yes	Request under review by Monitor and Consultants
6.7	Utilize more Custody Assistants	No	Meet and confer
6.10	Separate Custody Division	No	Long-term objective
7.1	Revamp Investigative and Disciplinary System	Yes	Request for additional IAB/ICIB resources reviewed by CEO
7.6	Enhance IAB/ICIB resources	Yes	See 7.1
7.8	Risk managers assigned to each facility	Yes	Request for Compliance Lieutenants reviewed by CEO
7.9	Force investigations by Compliance Lieutenant	Yes	See 7.1, 7.8
7.10	Reduction in charges	No	Meeting with Unions
7.13	Tracking of grievances in PPI	No	See 3.9
7.14	Enhance Inmate Grievance process	No	Coordinator appointed; pilot electronic program in development
7.15	Additional use of lapel cameras	Yes	Proposal for additional fixed CCTV cameras in lieu of initial lapel camera deployment