COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER

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WENDY L. WATANABE
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July 11, 2013

TO: Supervisor Mark Ridley-Thomas, Chairman
Supervisor Gloria Molina
Supervisor Zev Yaroslavsky
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 SEPTEMBER 1, 2012 THROUGH NOVEMBER 30, 2012 – EIGHTH STATUS REPORT**

On August 17, 2010, your Board instructed the Auditor-Controller 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 eighth 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.

In October 2012, an additional provision was added that increased the number of provisions in the settlement agreement to 42. Therefore, we are responsible for monitoring the status of 23 of the 42 provisions from the DOJ settlement agreement. Twelve of the other nineteen provisions are being monitored by the County Department of Mental Health 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 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.

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 DOJ Monitor determines that Probation has met most of a provision's requirements, the DOJ Monitor will then authorize placing the provision into "formal monitoring", and will continue to track Probation's compliance. If Probation continues to meet the requirements of the provision for 12 consecutive months (under the amended agreement provisions 10 and 19 require 14 consecutive months), the DOJ Monitor will consider Probation to have completed formal monitoring (fully implemented) for that provision.

We evaluated Probation's progress in implementing the 23 provisions we monitor using monitoring tools developed by Probation and the DOJ Monitor. The monitoring tools include specific criteria, which result in a precise score. Prior to the start of our review, Probation and the DOJ Monitor had not developed monitoring tools for three provisions and Probation had fully implemented eight provisions. As a result, we reviewed 15 of the 23 provisions. Specifically, we reviewed 12 provisions that have not been fully implemented and three provisions that have been fully implemented. We continue to periodically review fully implemented provisions to ensure that Probation has maintained compliance with the requirements of those 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.

Results of Review

Our review disclosed that Probation continues to make progress in complying with the 15 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 13 (87%) of the 15 provisions; and Probation had a compliance level of 70% to 89% for the other two (13%) provisions.

	Number of Provisions			
Compliance Level	**As of Feb 29, 2012**	**As of May 31, 2012**	**As of Aug 31, 2012**	**As of Nov 30, 2012**
90% or higher	14	9	10	13
70% to 89%	2	3	2	2
69% or less	1	0	0	0

Attachment I is the detailed results of our monitoring for 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:AB: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 DEPARTMENT
JUVENILE CAMPS DOJ SETTLEMENT AGREEMENT MONITORING RESULTS
SEPTEMBER 1, 2012 THROUGH NOVEMBER 30, 2012

Scope of Review

In October 2012, an additional provision was added that increased the number of provisions in the settlement agreement to 42. We are responsible for monitoring 23 of the 42 provisions from the Department of Justice (DOJ) settlement agreement. Twelve of the other nineteen 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. The monitoring tools include specific criteria, which result in a precise score. Prior to the start of our review, Probation and the DOJ Monitor had not developed the monitoring tools for three provisions (including Provision 73), and Probation had fully implemented eight provisions. We reviewed 15 of the 23 provisions that we are responsible for monitoring. As a result, we reviewed 12 provisions that have not been fully implemented and three provisions that have been fully implemented. We continue to periodically review fully implemented Provisions to ensure that Probation has maintained compliance with the requirements of those 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.

Our review covered the 13 camps and five specialized units that were open from September 1, 2012 through November 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: 100%

Comments:

All 16 camps/units achieved substantial compliance of 100%. The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011. However, the amended agreement extended the formal monitoring period for this Provision to December 31, 2012. The DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 14 consecutive months. We will review this Provision again during our next quarterly review.

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 CMYC Security Unit was in substantial compliance with this Provision. In addition, the DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision during our next 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: 94%

Comments:

Thirteen (76%) of the 17 camps/units achieved substantial compliance of 90% or more. The remaining four camps/units achieved an average compliance level of 82%. The directors at the four camps did not ensure that supervisors completed their reviews of

use of force incidents within five business days, as required. Specifically, three (50%) of six reviews were late. Two of the reviews were outstanding an average of 20 days at the time of our review, and one review was completed five days late.

In addition, camp directors did not always ensure that supervisors conducted a Child Safety Assessment within the required two-hour timeframe. Specifically, four (33%) of the 12 assessments reviewed were completed an average of 18 hours late, and one (8%) assessment was outstanding 40 days at the time of our review.

The DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. However, since four of the camps/units did not achieve substantial compliance of 90% or more, we will continue to monitor this Provision each quarter.

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 DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision during our next 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.

Average Compliance Level: 100%

Comments:

All 14 camps/units achieved substantial compliance of 90% or more. During our fourth quarterly review, the DOJ Monitor indicated that Probation had fully implemented this

Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision again during our tenth 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:

Fourteen (88%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining two camps achieved an average compliance level of 89%. The DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision again during our tenth quarterly review.

Provision 19: Reduction of Youth on Youth Violence (YOYV)

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: 98%

Comments:

Fifteen (94%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining camp (Paige) achieved a compliance level of 84%. Specifically, the camp managers did not document one (20%) of five YOYV incidents in the Facility Incident Log.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011. However, the amended agreement extended the formal monitoring period for this provision to December 31, 2012. The DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 14 consecutive months. We will review this Provision again during our next quarterly review.

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 DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision again during our next quarterly review.

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: 96%

Comments:

The CASIU was in substantial compliance with this Provision. The DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision again during our tenth quarterly review.

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 all 15 camps/units were in substantial compliance with this Provision. In addition, the DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision during our next 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.

Average Compliance Level: 99%

Comments:

All 14 camps/units achieved substantial compliance of 90% or more. During our fourth quarterly review, the DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision again during our tenth quarterly review.

Provision 25: Development and Implementation of Suicide Prevention Policy

The County shall develop and implement adequate policies, procedures, and practices relating to suicide prevention.

This Provision applies to 13 camps and three specialized units.

Average Compliance Level: 99%

Comments:

All 16 camps/units achieved substantial compliance of 90% or more. During our fourth quarterly review, the DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision again during our tenth 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 you exhibiting suicidal behaviors, including creation of individual behavior modification programs, and decisions and appropriate clothing, bedding, and housing.

This Provision applies to the eight camps/units that had minors on Level 2 Enhanced Supervision (Level 2 Supervision) or Level 3 Enhanced Supervision (Level 3 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: 98%

Comments:

Seven (88%) of the eight camps/units achieved substantial compliance of 90% or more. The remaining camp (Gonzales) achieved a compliance level of 88%. The DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision again during our tenth quarterly review.

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: 87%

Comments:

29A - Mental Health Needs

Ten (67%) of the 15 camps/units achieved substantial compliance of 90% or more. The remaining five camps/units achieved an average compliance level of 77%. Specifically, staff at the five camps/units did not always initial the required documents acknowledging that they reviewed DMH's mental health assessments describing the minors' mental health needs. In addition, for three (60%) camps/units, DMH staff did not indicate the recommended type or level of housing for the minors on the Mental Health Recording Forms.

29B - Enhanced Supervision Level 3

This Provision applies to the six camps/units that had minors on Level 3 Supervision at the time of our review.

Four (67%) of the six camps/units achieved substantial compliance of 90% or more. The remaining two camps (Gonzales and Rockey) achieved a compliance level of 0%. The managers at the two camps did not ensure that constant supervision was provided for two minors on Level 3 Supervision.

29C - Enhanced Supervision Level 2

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

All three camps/units achieved substantial compliance of 90% or more.

The DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. However, since six of the camps/units did not achieve substantial compliance of 90% or more, we will continue to monitor this Provision each quarter.

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: 99%

Comments:

All six camps/units achieved substantial compliance of 90% or more. The DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision again during our tenth quarterly review.

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 two 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:

Two (67%) of the three camps/units achieved substantial compliance of 90% or more. The remaining camp (Gonzales) achieved a compliance level of 57%. Camp managers did not complete an Enhanced Supervision Observation Form and ensure that a Special Incident Report was completed entirely for one minor who was on Level 4 Supervision and was transferred out of the facility.

The DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. However, since one of the camps/units only achieved a compliance level of 57%, we will continue to monitor this Provision each quarter.

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 camp/units achieved an average compliance level of 86%. Probation management developed a training class on suicide prevention. However, Probation management did not ensure that all staff at the three camp/units received the training. Specifically, 5% of Probation Officers and 28% of non-peace officer staff from DMH, Los Angeles County Office of Education (LACOE), and Juvenile Court Health Services (JCHS) assigned to the three camp/units did not complete the training.

The DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision again during our next quarterly review.

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 all 15 camps/units were in substantial compliance with this Provision. In addition, the DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision during our next 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:

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 86%. Probation management developed a training class related to understanding, identifying, and responding to mental health and developmental disability needs. However, Probation management did not ensure that all staff at the three camps/units completed the training. Specifically, 30% of non-peace officer staff from Probation, LACOE, and JCHS assigned to the three camps/units did not complete the training.

The DOJ Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision again during our tenth quarterly review.

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/units were in substantial compliance with this Provision. In addition, the DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. We will review this Provision during our next quarterly review.

DOJ Settlement Agreement Provision
Monitored by the Auditor-Controller
Compliance Level Summary
For Monitoring Reviews Completed February 29, 2012 Through November 30, 2012

Provision	Description	Monitoring Results			
		Feb 29, 2012	May 31, 2012	Aug 31, 2012	Nov 30, 2012
9 (3)	Protection from Abusive Practices	N/A	N/A	N/A	N/A
10	Use of Force	99%	99%	99%	100%
11 (1)	Chemical Restraint	96%	N/A	N/A	N/A
12	Use of Force Review	95%	96%	95%	94%
13 (3)	Threat and Intimidation	N/A	N/A	N/A	N/A
14 (1)	Consumption of Alcohol by Staff	98%	N/A	N/A	N/A
15 (3)	Staffing	N/A	N/A	N/A	N/A
16 (1)	Orientation	N/A	N/A	N/A	100%
17 (2)	Rehabilitation & Behavior Management	N/A	N/A	N/A	N/A
18	Staff Training and Supervision of Youth	57%	74%	94%	94%
19	Youth-on-Youth Violence (YOYV)	98%	99%	97%	98%
20	Child Abuse Reporting	93%	96%	95%	95%
21	Child Abuse Investigation	98%	98%	98%	96%
22 (3)	Classification	N/A	N/A	N/A	N/A
23 (1)	Grievance System	98%	N/A	N/A	N/A
24 (1)	Youth Movement Between Probation Camps and/or Halls	N/A	N/A	N/A	99%
25 (1)	Development and Implementation of Policy (Suicide Prevention)	N/A	N/A	N/A	99%
27	Management of Suicidal Youth	98%	97%	100%	98%
29	Documentation of Suicide Precautions	89%	83%	88%	87%
30	Supervision of Youth at Risk of Self Harm	98%	94%	90%	99%
31	Suicide Precautions for Youth Awaiting Transfer to Another Facility	93%	76%	82%	82%
32	Training (Suicide Prevention)	89%	94%	93%	93%
34 (1)	Screening	100%	N/A	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	90%	91%	93%	93%
46 (1)	Discharge Summaries	99%	N/A	N/A	N/A
73 (2)	Increased Access to Community Alternatives	N/A	N/A	N/A	N/A
	Overall Average	93%	92%	94%	95%

Footnote Legend

(1) The DOJ Monitor indicated that Probation fully met the requirements of this provision by maintaining "substantial compliance" with this provision for 12 consecutive months (14 consecutive months for provisions 10 and 19).

(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 September Through November 2012

Camp/Unit	Date		Compliance Percentage for A-C Monitored Provisions (1)															
	Review Date	Period Reviewed	10	12	16	18	19	20	21	24	25	27	29	30	31	32	45	Average
Camp Gonzales	9/13/2012	Aug-Sept 2012	100%	78%	99%	96%	99%	95%	N/A	100%	100%	88%	56%	99%	57%	96%	95%	90%
Camp Scott	9/18/2012	Aug-Sept 2012	100%	100%	100%	96%	98%	96%	N/A	99%	99%	N/A	95%	99%	N/A	97%	92%	98%
Camp Scudder	9/20/2012	Aug-Sept 2012	100%	93%	100%	97%	100%	99%	N/A	96%	99%	100%	95%	N/A	N/A	99%	98%	98%
Camp Miller	9/24/2012	July-Sept 2012	100%	96%	100%	99%	98%	94%	N/A	100%	97%	N/A	100%	N/A	N/A	95%	96%	98%
Camp Kilpatrick	9/26/2012	July-Sept 2012	100%	95%	100%	99%	100%	97%	N/A	98%	96%	N/A	80%	100%	N/A	94%	97%	96%
Camp Munz	10/9/2012	Sept-Oct 2012	100%	95%	100%	97%	100%	91%	N/A	97%	98%	100%	90%	N/A	N/A	93%	94%	96%
Camp Mendenhall	10/11/2012	Sept-Oct 2012	100%	100%	100%	92%	100%	90%	N/A	100%	99%	100%	95%	N/A	N/A	91%	93%	97%
Camp Paige	10/16/2012	Aug-Oct 2012	100%	96%	100%	89%	84%	97%	N/A	100%	98%	N/A	100%	N/A	N/A	95%	91%	95%
Camp Afflerbaugh	10/18/2012	Aug-Oct 2012	100%	78%	100%	92%	99%	95%	N/A	96%	99%	92%	81%	N/A	N/A	93%	86%	93%
Camp Rockey	10/23/2012	Sept-Oct 2012	100%	100%	100%	89%	92%	98%	N/A	100%	99%	100%	46%	100%	90%	96%	84%	92%
Dorothy Kirby Center	10/25/2012	July-Oct 2012	100%	85%	100%	94%	100%	93%	N/A	100%	100%	100%	95%	97%	100%	89%	89%	96%
Special Housing Unit @ CMYC	11/6/2012	Sept-Oct 2012	100%	100%	N/A	97%	100%	91%	N/A	N/A	100%	100%	93%	96%	N/A	100%	100%	98%
Security Unit @ CMYC	11/6/2012	Aug-Nov 2012	100%	100%	N/A	90%	100%	92%	N/A	N/A	96%	N/A	N/A	N/A	N/A	81%	90%	94%
Camp McNair	11/8/2012	Sept-Oct 2012	100%	98%	100%	97%	100%	97%	N/A	100%	100%	N/A	80%	N/A	N/A	94%	94%	96%
Camp Onizuka	11/13/2012	Sept-Oct 2012	100%	100%	99%	94%	98%	97%	N/A	100%	100%	N/A	100%	N/A	N/A	88%	96%	97%
Camp Jarvis	11/15/2012	Sept-Oct 2012	100%	100%	100%	90%	98%	93%	N/A	100%	100%	N/A	95%	N/A	N/A	92%	98%	97%
CASIU	11/9/2012	Aug-Oct 2012	N/A	N/A	N/A	N/A	N/A	N/A	96%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	96%
DOJ Compliance Bureau	11/6/2012	July 2012	N/A	88%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	88%
Average Compliance Percentage			**100%**	**94%**	**100%**	**94%**	**98%**	**95%**	**96%**	**99%**	**99%**	**98%**	**87%**	**99%**	**82%**	**93%**	**93%**	**95%**

Footnote Legend

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

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