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April 21, 2015

TO: SUPERVISOR MICHAEL D. ANTONOVICH, Mayor
SUPERVISOR HILDA L. SOLIS
SUPERVISOR MARK RIDLEY-THOMAS
SUPERVISOR SHEILA KUEHL
SUPERVISOR DON KNABE

FROM: MAX HUNTSMAN
Inspector General

RE: Reports by the Inspector General

Enclosed please find the Office of Inspector General's 2015 FIRST QUARTER STATUS REPORT: The Los Angeles Sheriff's Department Implementation of The Citizens' Commission on Jail Violence Recommendations.

If you have any questions concerning this report, please contact me at (213) 974-6100.

Enclosure

c: Jim McDonnell, Sheriff

Sachi A. Hamai
Chief Executive Officer

Patrick Ogawa, Executive Officer
Board of Supervisors

Mark Saladino
County Counsel

County of Los Angeles
Office of Inspector General

2015 FIRST QUARTER STATUS REPORT: The Los Angeles Sheriff's Department Implementation of The Citizens' Commission on Jail Violence Recommendations

Max Huntsman
Inspector General

April 8, 2015

2015 FIRST QUARTER STATUS REPORT
APRIL 8, 2015

Since the Office of Inspector General's (OIG) *2014 Fourth Quarter Status Report* on the Los Angeles County Sheriff's Department's implementation of the Citizens' Commission on Jail Violence (CCJV) recommendations was submitted on January 20, 2015, the Department has made additional progress in a number of areas. As the OIG increases its staffing, it intends to implement the monitoring plan set forth in its *First Status Report and Monitoring Plan.* The critical issue of OIG access to personnel files and other confidential materials remains unresolved, thereby limiting the effectiveness of much of the OIG's monitoring plan. The OIG respectfully submits to the Board of Supervisors its 2015 First Quarter Status Report.

Since the OIG's *2014 Fourth Quarter Status Report*, the implementation status of the CCJV recommendations remains unchanged, with the exception of Recommendation 6.5, which is now "Implemented," but which requires further monitoring by OIG as noted in the *First Status Report and Monitoring Plan.*[1] For this reporting period, the OIG has spoken regularly with executives and managers Department-wide to obtain necessary information and data. The OIG spoke with Sheriff Jim McDonnell's aide, Custody Division lieutenants and personnel from Custody Support Services (CSS) and Custody Training and Standards Bureau (CTSB), and met with personnel from the Data Systems Bureau (DSB), the Internal Affairs Bureau (IAB) and the Internal Monitoring, Performance Audits and Accountability Command (IMPAAC). The Department was accommodating in providing additional data when requested.

The OIG meets weekly with the Assistant Sheriff, Custody Division, Terri McDonald and the Custody Division chiefs and meets individually with Terri McDonald several times each

1 CCJV Recommendation 6.5: "The number of supervisors to deputies should be increased and the administrative burdens on Custody supervisors should be minimized."

month in person or via telephone. The OIG continues to attend Executive and Custody Force Review Committee (EFRC and CFRC) meetings, Critical Incident Reviews (CIR), Prisoner Death Reviews, Suicide Prevention Subcommittee and Complex Case Committee meetings.

This report provides updates on the implementation status of each CCJV recommendation which is "In progress" or "Partially implemented," as well as updates on "Implemented" recommendations 3.10, 4.1, and 4.8 related to the Sheriff's direct involvement in the oversight of the jails. Of the remaining 45 recommendations that have been identified as "Implemented," 37 require additional OIG monitoring. The table below reflects the implementation status and monitoring requirements of each of the five sets of CCJV recommendations:

IMPLEMENTATION STATUS AND MONITORING REQUIREMENTS

Recommendations	"Implemented," Requires No Additional Monitoring	"Implemented," Requires Additional Monitoring	"Partially Implemented"	"In Progress"	Total
USE OF FORCE	0	10	0	2	**12**
MANAGEMENT	7	5	0	2	**15**
CULTURE	0	5	3	0	**8**
PERSONNEL AND TRAINING	1	5	3	1	**10**
DISCIPLINE	0	12	2	1	**15**
Total	**8**	**37**	**8**	**6**	**59**

The table below reflects the monitoring requirements of each recommendation that has been identified as "Implemented," "Partially Implemented," and "In Progress" and highlights recommendations the proper monitoring of which requires OIG access to personnel records:

CCJV Monitoring Requirements

*Monitoring of items in blue requires access to personnel records		
"Implemented," Requires Further Monitoring:	**USE OF FORCE**	3.1. LASD should promulgate a comprehensive and easy-to-understand Use of Force Policy in a single document
		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
		3.3 All LASD personnel should be provided training on 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
		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
		3.6. The Use of Force Policy should articulate a strong preference for planned, supervised, and directed force
		3.7. The Use of Force Policy should account for the special needs populations in the jails
		3.9 Inmate grievances should be tracked in PPI by the names of LASD personnel
		3.10. LASD should analyze inmate grievances regarding the use of force incidents
		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
	MANAGEMENT	4.1. The Sheriff must be personally engaged in oversight of the jails
		4.8. The Sheriff must regularly and vigilantly monitor the Department's Use of Force in the jails
		4.9. The Department should implement SCIF [the Sheriff's Critical Issues Forum] on the Custody side to improve the accountability of jail supervisors
		4.10. Senior management needs to be more visible and engaged in Custody
		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
	CULTURE	5.1. The Department must continue to implement reforms that emphasize respect for, engagement of, and communications with inmates
		5.4. The Department must make Custody a valued and respected assignment and career
		5.5. Senior leaders must be more visible in the jails
		5.6. LASD must have a firm policy and practice of zero tolerance

"Implemented," Requires Further Monitoring: (Cont'd)	**CULTURE (Cont'd)**	for acts of dishonesty that is clearly communicated and enforced
		5.7. The Department should have a sensible rotation policy to protect against the development of troubling cliques
	PERSONNEL AND TRAINING	6.2. The Department should develop and implement a long-range and steady hiring plan based upon normal attrition
		6.4. There should be a meaningful probationary period for new deputies in Custody
		6.5. The number of supervisors to deputies should be increased and the administrative burdens on Custody supervisors should be minimized
		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
		6.8. Rotations within and among proximate facilities should be implemented
	DISCIPLINE	7.1. The investigative and disciplinary system should be revamped
		7.2. The CFRC [Custody Force Review Committee] should monitor Force Packages for trends and concerns and the performance of supervisors
		7.3. Deputies should be required to provide a timely written report of force incidents and not be allowed to review videotape footage prior to the completion of that report or any interviews
		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
		7.5. IAB and ICIB should be part of an Investigation Division under a Chief who would report directly to the Sheriff
		7.7. The Disciplinary Guidelines should be revised to establish increased penalties for excessive force and dishonesty
		7.8. Each jail should have a Risk Manager to track and monitor use of force investigations
		7.9. Force investigations should not be conducted by deputies' supervisors
		7.10. Captains should not reduce charges or hold penalties in abeyance for use of force, dishonesty, or failure to report force incidents
		7.11. The Department should vigorously investigate and discipline off-duty misconduct
		7.12. The Department should implement an enhanced and comprehensive system to track force reviews and investigations
		7.13. Inmate Complaints should be tracked by deputies' names in PPI
"Partially Implemented":	**USE OF FORCE**	(none)
	MANAGEMENT	(none)
	CULTURE	5.2. The Department's Force Prevention Policy should be stressed in Academy training and reiterated in continuing Custody Division training

"Partially Implemented": (Cont'd)	**CULTURE (Cont'd)**	5.3. The Department should enhance its ethics training and guidance in the Academy as well as in continuing Custody Division training
		5.8. LASD should discourage participation in destructive cliques
	PERSONNEL & TRAINING	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
		6.3. Deputies and supervisors should receive significantly more Custody specific training overseen by the Department's Leadership & Training Division
		6.7. The Department should utilize more Custody Assistants
	DISCIPLINE	7.6. IAB should be appropriately valued and staffed by personnel that can effectively carry out the sensitive and important work of that bureau
		7.14. The inmate grievance process should be improved and include added checks and oversight.
"In progress":	**USE OF FORCE**	3.8 PPI and FAST should be replaced with a single, reliable, and comprehensive data tracking system
		3.12 Department should purchase additional body scanners
	MANAGEMENT	4.11. Management should be assigned and allocated based on the unique size and needs of each facility.
		4.12. LASD should create an Internal Audit and Inspection Division
	CULTURE	(none)
	PERSONNEL & TRAINING	6.10. The Department should create a separate Custody Division with a professional workforce
	DISCIPLINE	7.15. The use of lapel cameras as an investigative tool should be broadened

USE OF FORCE

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

Status: *In progress, funding approved*

The Department reports that the new Performance Recording and Monitoring System (PRMS) is on schedule to debut by the December 2016 target date. Since the OIG's *2014 Fourth Quarter Status Report*, the Data Systems Bureau (DSB) hired two contractor consultants to assist with the construction of the PRMS. The DSB reports that it has completed many of the

"recording and monitoring" functions for the PRMS and the main pages for several of the modules within the system are complete. In addition, the DSB reports that the Inmate Complaints, Traffic Collision, and Service Comment modules now allow for the functioning of various transaction and reporting features.

The DSB designed the PRMS to be a secured web-based model as opposed to a client-server model. The Personnel Performance Index (PPI) is a client-server model, meaning that the DSB must equip each user of the data system with proper computer software. This requires individual installations for each client wanting to access the data system's server. As a secured web-based model, the DSB does not have to conduct individual installations and can repair or update the PRMS from a centralized location. Moreover, a secured web-based model makes the PRMS compatible with modern technology.

In order to remain on track for its 2016 target date, the DSB reports that it put a temporary freeze on any changes to the PPI. All requests for changes to the PPI collected during the freeze will be assessed for suitability and priority in the new PRMS and will be implemented after the PRMS is running.

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

Status: *Implemented*

The Department reports that it continues to make progress toward more meaningful analysis of inmate (prisoner) grievances. The Department reports that it is in the process of drafting a new policy for prisoner complaints to be incorporated into Chapter Eight of the Custody Division Manual, pending final approval. Additionally, the Department reports that it will transition to a new system for handling grievances whereby a Grievance Team within CSS will act as a centralized source for analysis of prisoner grievances. Despite this progress, the

Department is still not in compliance with its policy requiring a 5 or 15-day disposition of prisoner grievances.

The Department's new Grievance Team will be headed by a lieutenant overseeing one sergeant and one professional staff member. This team will be assisted by smaller teams consisting of sworn personnel and custody assistants at each facility. In order to ensure consistent workloads across facilities the number of personnel designated for each unit grievance team will depend upon the number of complaints historically produced at each facility.

The Department reports that utilization of a Grievance Team will ease the burden on compliance lieutenants who cannot currently allocate enough time to thoroughly analyze the large volume of grievances in addition to their other duties.[2] The Department expects team members to begin working in the new fiscal year.[3] Once team members are hired, the Department reports that duties of compliance lieutenants will shift away from analysis of grievances toward their other duties.

As of the OIG's *2014 Fourth Quarter Status Report*, the OIG began receiving data on completed force allegation inquiries made between January 1, 2013, and September 30, 2014, to conduct a qualitative review of each case. The purpose of the review is to determine in each case whether Department policy and protocols were followed and whether investigations were thorough, fair and complete with appropriate dispositions. The OIG has not received the requested documents on force allegations from LASD in full. The Department has had difficulty in gathering all of the cases due to documents and data not being stored in a centralized location.

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[2] Compliance lieutenant duties are detailed in the MPP, section 2-01/060.50.

[3] The *Rosas* litigation requires that the Department have its Grievance Team functioning by December 2015.

3.12. The Department should purchase additional body scanners.

Status: *In progress*

The Department reports that it is currently evaluating its future needs for body scanners, taking into account staffing and other issues encountered when using the machines. Currently, body scanners are operating at IRC and CRDF. Scanners are currently utilized to detect contraband and as needed for investigations. Since the OIG's *2014 Fourth Quarter Status Report*, the Department's body scanner vendor repaired the broken scanner at IRC and the OIG observed the scanner operating during a routine booking screening for contraband. The Department reports that it will eventually expand the use of body scanners to one or more of the northern facilities.

The Department reports that body scanner operation is a considerable expense. Initially, the Board of Supervisors allocated funding for 20 body scanners across LASD facilities. The Department reports that this funding covered only the cost of the equipment and not the cost of staffing the machines. The Department reports that each scanner requires multiple personnel to run effectively while manual strip searches of multiple prisoners can often be conducted by a single deputy.[4] The Department reports that, at this time, allocating additional staffing to body scanners, as the Department increases staffing to address the *Rosas* Implementation Plan and the Department of Justice Stipulated Agreement requirements, is not feasible. However, the Department reports that it is completing an analysis of appropriate additional locations to which scanners can be expanded as well as staffing costs associated with full deployment of all 20 scanners.

[4] The OIG has requested that the Department conduct a comparison of the relative costs of scanner operation versus manual cavity searches so that a reasonable budget proposal can be presented.

In the past, the Department has reported that its personnel faced challenges adapting to the new technology, specifically in identifying contraband on the scanners' monitors. As a result, the Department contemplated upgrading to high-resolution monitors and is seeking additional training from the scanner vendor to assist staff in reading the monitors. Currently, the Department has delayed any decisions to upgrade the equipment until it decides whether to move forward with the implementation of additional scanners. The Department also continues to report that some prisoners remain reluctant to cooperate with scanner searches and some gangs within the jails have issued directives to members to refuse the body scanner process altogether.[5]

MANAGEMENT

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

Status: *Implemented*

In the preparation of this report, the OIG spoke with the Sheriff's aide who provided information about the Sheriff's personal oversight of the jails since his swearing in on December 1, 2014. The Sheriff's aide reported that since the Sheriff's swearing in, the Sheriff has visited Men's Central Jail (MCJ), Century Regional Detention Facility (CRDF), Twin Towers Correctional Facility (TTCF), Inmate Reception Center (IRC), North County Correctional Facility (NCCF) and Pitchess Detention Facilities (Pitchess), North and South. The Sheriff has not visited Pitchess East, which accommodates the Department's Fire Camp, but his aide reports that he is currently scheduling a visit.

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[5] The OIG previously reported on November 21, 2014, *Analysis of the Legal Basis for X-ray Body Scanner Searches in County Jail Facilities,* that rates of refusal to submit to x-ray body scans were negligible in comparison to the number of prisoners processed through the body scanners. The Department reports that the Latino gang network known as the "Southsiders" continue to refuse to submit to the scanner. However, the refusal rate during the pilot project was only 3.28% of 16,231 prisoners. Additionally, almost all refusals occurred at the court line since new prisoners were not familiar with the Southsiders' edict.

At MCJ, CRDF, TTCF and IRC, the Sheriff took full tours of each facility. At Pitchess North and South, the Sheriff toured the main visitors' center and one housing module at each facility. At NCCF, he visited the facility's vocational programs and one housing module. The Sheriff is set to return to TTCF and all four northern facilities by April 30, 2015.

The Sheriff reports that he is taking an active role in the disciplinary process. The Sheriff himself now signs off on each disposition of disciplinary action for personnel misconduct from the Case Review Committee.[6] Currently, the Sheriff only reviews dispositions of disciplinary actions that would result in excess of 15 days suspension, demotion or dismissal, following approval of the Case Review Committee. In the future, the Sheriff anticipates signing off on all disciplinary actions which, the Department reports, averages seven cases per week.

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

Status: *Implemented*

The Sheriff's aide reports that the Sheriff receives daily the Department's Force Synopsis as well as a monthly synopsis of force used, broken down by category (Category 1, 2, and/or 3). The Sheriff's aide then briefs the Sheriff on these synopses. The Department reports that the Sheriff is personally notified of all Category 3 uses of force and has reviewed video footage of some force incidents. Additionally, the Sheriff meets with the Assistant Sheriffs weekly to discuss issues across the Department, including use of force in the jails.

[6] The Case Review Committee reviews disciplinary decisions made by a Division Chief or Division Director that exceed a 15-day suspension. The committee assesses factors in the decision-making process before disciplinary action is taken. MPP 3-14/120.10.

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

Status: *In progress (funding approved)*

As of the OIG's *2014 Fourth Quarter Status Report*, the Department received funding for 19 new full-time permanent clerical positions to replace 19 deputies who will be moved to line duty. An allotment was provided to each facility based on size and clerical needs. Since last quarter, the Department reports that it filled 13 of these 19 positions. The Department reports that the remaining ten positions will be filled by May 2015.

On November 26, 2014, the commander over CRDF left the post to begin the transition into retirement. Consequently, the Commander over TTCF is acting Commander over both CRDF and TTCF, which is problematic given the size, complexities, and operational demands of each facility.

4.12. LASD should create an Internal Audit and Inspection Division

Status: *In progress (funding approved)*

The IMPAAC is still in Phase II of its three-phase hiring scheme. With a total of 51 funded positions through Phase II, the IMPAAC filled all but 1sergeant and 1 lieutenant position and 6 professional civilian auditor positions. While the IMPAAC anticipated hiring a Head Compliance Auditor in January 2015, the chosen candidate is still in the hiring process but is expected to join IMPAAC in May.

The IMPAAC reports that it determines its audit topics either at the request of the Sheriff or through its own independent decision-making power, subject to approval by the Sheriff. Since its inception, the IMPAAC has initiated 21 special projects (18 completed), 11 law enforcement audits (8 completed), and 12 inspections (12 completed). The IMPAAC has not

initiated additional inspections because the unit determined that it was an inefficient use of resources.[7] After each audit, special project, or inspection, the IMPAAC reports that the IMPAAC staff conducts a Quality Assurance assessment to determine lessons learned about the audit process in order to make adjustments for future projects.

The IMPAAC reports that personnel are currently working on three law enforcement audits (one developed with the help of the OIG) and nine special projects. Of the eight audits completed, seven reviewed Custody Division's personnel rotation (Recommendation 5.7) while the last reviewed uniform crime reporting in Patrol Division operations. The subject matter of the IMPAAC unit's special projects has varied. Special projects have included:

- The IMPAAC unit drafted its organizational policy and is waiting for final determinations on several issues, including a possible name change, before formalization.
- Unit Mentoring Assessment: The Department's Executive Officer requested that the IMPAAC analyze and formalize procedures for performance mentoring to ensure uniformity across command units.[8] The policy is in draft form and will be implemented upon approval.
- Antelope Valley project: The IMPAAC unit served as an objective fact-finder in the dispute regarding housing rights in the Antelope Valley. The project involved coordination across multiple agencies, including the Department of Justice.

[7] The IMPAAC's inspections acted as follow up to the Department's existing Command Inspection process. During the Command Inspection Process, subject matter experts conduct inspections throughout the Department at LASD management's direction. The hours required to independently research and re-inspect each inspection assumed resources of more pertinent projects and, the Department reports, were duplicative of the work conducted via the Command Inspection process.

[8] The Department uses performance mentoring as a tool to assess and develop employee job performance. The goal of performance mentoring is to review employee job performance and create improvement plans when appropriate or necessary. Supervisors work closely with employees during this process to provide mentoring, counseling and training in order to improve their job performance.

- The Shooting Review Committee: The Shooting Review Committee is a review process for deputy involved shootings for any employee with prior shooting incidents on record. The review consists of analysis by a panel consisting of five LASD lieutenants and the IMPAAC Captain, focusing on analysis of tactical, training, and risk management issues and is initiated immediately following the subsequent shooting. Within 30 days, the committee prepares a report for the commander over Critical Incident Review who then makes any training, corrective action, or other determinations.

CULTURE

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

Status: *Partially implemented (funding approved)*

The Department reports that the LASD academy and annual trainings are currently undergoing significant changes due to obligations arising from the *Rosas* Implementation Plan and DOJ Stipulated Agreement. The Department reports that to comply with these legal obligations, it is adding two weeks to its four-week Jail Operations basic training for new Custody Division deputies. Separate from the Jail Operations basic training, the Jail Operations Continuum includes additional custody specific trainings for new Custody Division personnel. The OIG reviewed the Department's Jail Operations Continuum training curriculum to confirm that the training includes a four-hour Force Concepts course which elaborates on LASD's Force Prevention Policy.

The Department reports that it is reconfiguring its annual training scheme for existing deputies but cannot implement these trainings until the Department complies with its obligations

under the *Rosas* Implementation Plan and the DOJ Stipulated Agreement. The new scheme for annual trainings is a movement toward mandatory trainings as opposed to allowing personnel to select from a variety of offered courses. Furthermore, schedules of mandatory annual trainings will be tailored to the training needs of each position within the Department. These trainings will include a refresher course on the Department's Use of Force Policy, as revised to account for obligations arising out of the *Rosas* Implementation Plan and DOJ Stipulated Agreement, as well as a course on ethics. While the Department expected to commence with these trainings in January 2015, the *Rosas* Implementation Plan and DOJ Stipulated Agreement significantly delayed their implementation.

The Department reports that it ordered and received ten full-size manikins for enhanced critical incident training for all jail facilities. The Department distributed one manikin to each jail facility and kept two for training purposes. Manikins will help with scenario-based trainings, particularly man down drills, suicide prevention drills, and cardiopulmonary resuscitation techniques.

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

Status: *Partially implemented (funding approved)*

The OIG reviewed the Department's Jail Operations Continuum training curriculum to confirm that the training includes a four-hour course on ethics. LASD is currently revising annual trainings for the Custody Division (See Recommendation 5.2).

5.8. LASD should discourage participation in destructive cliques.

Status: *Partially implemented (funding approved)*

The OIG reviewed the Department's Jail Operations Continuum curriculum to confirm that the training includes an eight-hour course on values-based decision making. LASD is currently revising annual trainings for the Custody Division (See Recommendation 5.2). The Department intends to improve its tattoo policy, in part to address clique related issues, but is still in the drafting phase. Discouraging destructive cliques is a long-term challenge which requires constant vigilance.

PERSONNEL AND TRAINING

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.

Status: *Partially implemented (funding approved)*

In addition to the implementation of the Dual Track Career Path, the creation of the CTSB, and the expansion of custody specific trainings, the Department reports that it is restructuring procedures for overtime personnel in Custody Division operations. Previously, personnel requesting overtime filled vacant shifts in custody facilities regardless of their custody specific expertise or recent custody experience. This created potential issues, especially where Patrol Division sergeants would fill overtime shifts in supervisory overtime positions within the Custody Division after spending years on patrol, outside of a custody environment. Although patrol supervisors were once assigned to the Custody Division prior to their patrol assignments and may recall some custody specific policies and procedures, Department policies, procedures and tactics with regard to custody operations have changed significantly in recent years. This poses a risk where overtime sergeants are responsible for supervisory roles that they are not

properly trained to fill. The Department is currently aware of this issue and is in the process of creating new protocol for overtime supervisors filling Custody Division positions. The Department reports these new protocols are still in the early stages of development.

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

Status: *Partially implemented (funding approved)*

The Department reports the following progress toward the goal of mandatory custody specific training of all personnel, overseen by the CTSB:

Custody Division S.T.C. Training Report (FY 2014/2015) as of 2/28/15										
Course	**South**	**NCCF**	**East**	**North**	**MCJ**	**CRDF**	**TTCF**	**IRC**	**PMB**	**Total**
No. of staff requiring STC training	**257**	**354**	**22**	**207**	**641**	**393**	**734**	**393**	**136**	**3137**
Interacting with Mentally Ill	77%	93%	41%	98%	71%	90%	72%	100 %	34%	75%
Force Concepts/ Ethics	63%	65%	45%	91%	52%	51%	46%	71%	13%	55%
Jail Specific Restraint	86%	98%	68%	100%	66%	78%	50%	67%	8%	69%
Use of Force Investigations	100%	96%	0%	100%	100%	100%	93%	89%	0%	97%
Inmate Extraction Training	83%	98%	50%	100%	100%	100%	100%	96%	0%	81%

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

Status: *Implemented*

The Department reports that utilization of custody assistants eased some of the administrative burdens on LASD supervisors. Since the OIG's *2014 Fourth Quarter Status Report*, the Department reports that it filled nine additional sergeant positions in January. This

recommendation is now implemented but the OIG will continue to monitor administrative burdens on Custody Division supervisors and the ratio of Custody supervisors to deputies as outlined in its *First Status Report and Monitoring Plan.*

6.7. The Department should utilize more custody assistants.

Status: *Partially implemented*

The Department provided the OIG with data that includes the number of deputies, senior deputies, and custody assistants assigned to the Custody Division for the months of September 2012, 2013, 2014, and March 2015. The table below reflects these numbers as the ratio of deputies (including senior deputies) to custody assistants:

Month/Year	Deputies/Custody Assistant Ratio
September 2012	66.2 : 33.9
September 2013	64.7 : 35.3
September 2014	65.5 : 34.5
March 2015	66.1 : 33.9

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

Status: *In progress*

The Department reports that it continues to build its professional Custody Division workforce through attendance at local and national corrections conferences and consultation with national corrections leaders. Custody Division personnel attended the Winter Conference of the American Correctional Association and management consulted with multiple state and local

corrections agencies regarding psychiatric medication procedures, body scanners and tactical protection for custodians against prisoner gassings.[9]

DISCIPLINE

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

Status: *Partially implemented (funding approved)*

Since the OIG's *2014 Fourth Quarter Status Report*, the IAB reports that it completed its Phase II expansion from four to six response teams between October 2013 and December 2014.

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

Status: *Partially implemented*

The Department reports that there remains a large backlog in scanning all existing complaints into the Custody Automated Recording and Tracking System (CARTS), LASD's system used to track prisoner grievances. The Department reports that although each facility now has a scanner to input the prisoner grievances to the CARTS, creating uniformity and streamlining the input method, it does not have sufficient staff allocated to the grievance process.

Prisoner grievance data is currently incomplete, partially due to the large backlog and as reported above, the Department does not adhere to its 5 and 15-day complaint processing requirements. The Department is optimistic that iPads will dramatically improve its grievance system and it is currently in the process of purchasing 500 additional iPads with an expected

[9] LASD's Mental Health Task Force observed medication procedures at Lancaster State Prison. LASD management observed body scanner procedure at Cook County Department of Corrections in Chicago, Illinois; Denver County Jail in Denver, Colorado; and Metropolitan Detention Center of Bernalillo County in Albequerque, New Mexico. Department command staff observed the use of portable shields to protect against gassings at San Quentin State Prison.

arrival date at the end of May. The 17 iPads originally deployed as part of the pilot program remain in use.

The Department reports that iPads are currently functioning approximately 85% of the time, with infrequent network interruption on a few devices at MCJ. This problem should be resolved with the implementation of a new Inmate Data Network (IDN). The Department reports that it already received funding for the IDN infrastructure through the Inmate Welfare Commission and that the network to coordinate the IDN and iPad systems is currently in development.

When iPads are not available, the Department reports that it must use paper grievance forms, which LASD managers say poses several challenges. The OIG noted problems in past reports whereby both personnel and prisoner complainants reported issues with entrusting the prisoner trustees or staff against whom they are complaining to deposit grievance forms on their behalf. Prisoners still complain of these issues to the OIG but their allegations are difficult to investigate because no mechanism exists to identify which staff person received a complaint or when a complaint was received. The Department hopes that the implementation of video cameras across all facilities will help to alleviate these gaps in accountability within the grievance system (See Recommendation 7.15).

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

Status: *In progress (alternative implementation)*

The Department opted for an alternative implementation of this recommendation. Rather than purchasing lapel cameras, the Department is installing fixed cameras in facilities department wide. The Department is in year two of its five year implementation plan for fixed cameras. The Department reports that it continues to install additional cameras and bring them online. At

MCJ, all 238 cameras are installed and 211 have been brought online, meaning that their location is identified within the larger network and that they are recording footage. The Department has installed 96 cameras at TTCF and 20 at IRC and reports that it will begin bringing cameras to its northern facilities next year after infrastructure upgrades are complete.

The DSB reports that footage is stored in a centralized location near each facility, meaning that MCJ, TTCF and IRC share one centralized, secured storage location, as do the northern facilities. Only the DSB has access to each secured storage location. Originally, the LASD stored footage for two years, the statutory limit for asserting a claim against the Department/County in state court. However, in order to store footage for two years in a cost-effective manner, the Department could only store footage at five frames per second. Ultimately, this impacted video quality and actions by deputies and prisoners were sometimes lost in between frames. Therefore, the Department determined that with available funding, it could store one year of footage at ten frames per second, which is not optimal, but the Department reports, is sufficient for investigative purposes.