



**Office of Inspector General
County of Los Angeles**

**Max Huntsman
Inspector General**

**Reform and Oversight Efforts:
Los Angeles County Sheriff's
Department**

October 2017

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INTRODUCTION

The Office of Inspector General is charged by the Board of Supervisors with four primary functions:

- Monitoring the Department's operations and conditions in the jail facilities, including the Department's response to prisoner and public complaints.
- Periodically reviewing data on the Department's use of force, the Department's investigations of force incidents and allegations of misconduct and the Department's disciplinary decisions.
- Conducting periodic audits and inspections of Department operations and reviewing the quality of the Department's audits and inspections.
- Regularly communicating with the public, the Board of Supervisors and the Sheriff's Department regarding the Department's operations.

This report is a brief summary of some of the Office of Inspector General's activities through the third quarter of 2017 year toward fulfilling these functions.

ACCESS

From January 1, 2017, to September 30, 2017, the Department has placed no conditions or restrictions on access nor has any request for access been denied by the Department.

The Office of Inspector General (OIG), subsequent to the implementation of the Memorandum of Agreement to Share and Protect Confidential LASD Information in December 2015, identified to the Department's Technology and Support Division the data collection systems and databases to which the OIG desired access. The Department has approved OIG access to these databases and data collection systems. The Executive Office's Information Resource Management staff and the Department's Technology and Support Division staff have been coordinating the OIG's secure, read only access to these data systems.

The OIG's target date for completion of this project was September 30, 2017; full access has not yet been attained. Although the Sheriff has authorized access, the OIG has experienced issues with the acceptance of

OIG credentials in four of the applications. These are system issues, not authorization issues, and the Department's Data Systems Bureau is working with the OIG to resolve them.

MONITORING

The OIG responds to the investigations all Deputy Involved Shootings to which the Department's Internal Affairs Bureau force/shooting response teams respond. The Office of Inspector General also responds to investigations of all deaths of persons which occur while in the custody of the Sheriff's Department or after contact with Department personnel, all uses of force which are the proximate cause of a person's death or serious injury and other significant events to which the IAB force/shooting response teams respond.

Deputy Involved Shootings

Shootings: July 1 through September 30, 2017

From July 1, 2017, to September 30, 2017, the OIG responded to five investigations of Deputy Involved Shootings. Three people were injured, two of them fatally. These shootings are described below. The Office of Inspector General recommends that similar narrative descriptions be provided on the Department's website for all Deputy Involved Shootings. These descriptions are offered to provide an understanding of situations that commonly lead to Deputy Involved Shootings.

Palmdale The Department reported that at about 1:50 p.m. on July 4, 2017, a deputy attempted to conduct a traffic stop for a speeding violation. The male Hispanic driver drove onto the lawn of a residence, jumped out of the car and ran to the back yard. The pursuing deputy followed the driver on foot. The driver charged toward the deputy with a stick in one hand and a knife in the other. The deputy fired one shot, striking the driver in the chest.

The driver was transported to the hospital and survived his wound.

An Office of Inspector General staff member was present at the scene of the investigation and afforded full access.

Los Angeles (south) The Department reported that at about 7:17 p.m. on August 16, 2017, during a foot pursuit by a deputy of an African-American man armed with a firearm, the man pointed a gun at the deputy. The deputy fired several shots at the man, striking him in his torso. The man was transported to the hospital where he was pronounced dead. The man's handgun was recovered at the scene.

An Office of Inspector General staff member was present at the scene of the investigation and afforded full access.

Valinda The Department reported that at about 5:43 p.m. on September 11, 2017, deputies responded to a family dispute where they confronted in the back yard a male Hispanic who had exited the residence through a window. The male was armed with both a pistol and a rifle. The man fired the pistol at deputies, who both shot back. The man was pronounced dead by responding paramedics.

An Office of Inspector General staff member was present at the scene of the investigation and afforded full access.

Office of Inspector General staff also responded to two shootings which did not result in injury. Because these were intentional discharges at a person, they, too, are included in deputy involved shooting counts.

Lynwood The Department reported that at about 2:06 a.m. on July 22, 2017, deputies attempted to contact a male Hispanic bicyclist who had been identified as carrying a gun. When the bicyclist stopped he was ordered by deputies to show his hands. Instead, the bicyclist reached for his waist while telling the deputies he had a gun. One of the deputies fired one shot. The shot did not strike the bicyclist, who immediately surrendered.

No one was injured by the gunfire. A replica firearm was recovered.

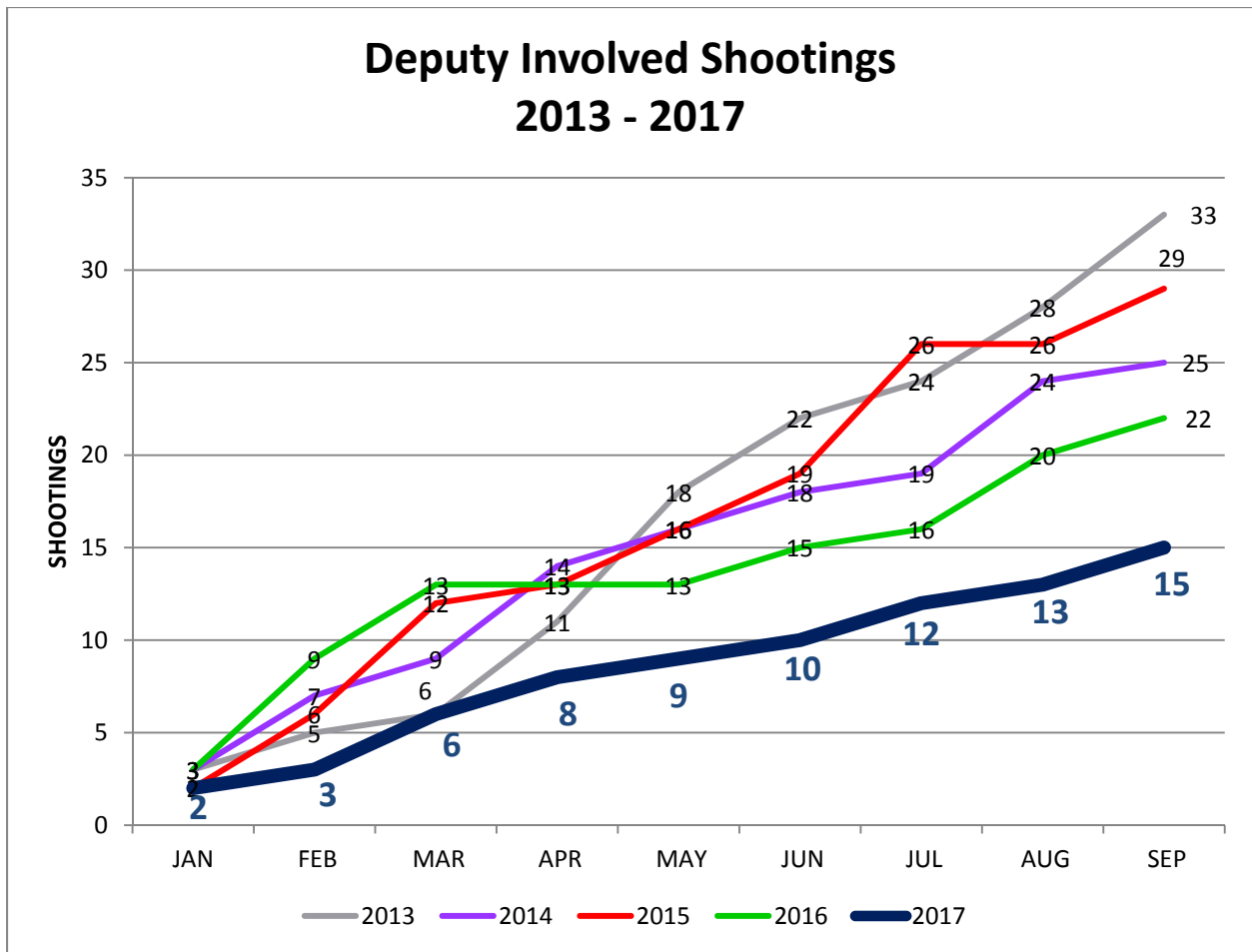
An Office of Inspector General staff member was present at the scene of the investigation and afforded full access.

La Puente The Department reported that at about 3:14 a.m. on September 8, 2017, deputies responded to a disturbing the peace call at a

residence. When deputies knocked on the door of the residence, an occupant fired multiple shots through the door at the deputies. The deputies took cover and the occupant continued to shoot at the deputies through a sliding glass door. One of the deputies shot through the sliding glass door using a rifle. The male Hispanic occupant surrendered and no one was injured by the gun shots.

An Office of Inspector General staff member was present at the scene of the investigation and afforded full access.

Comparison to prior years



The Office of Inspector General includes in Deputy Involved Shootings: 1) shootings in which Department personnel shot at a person or at a vehicle or vessel occupied by a person, regardless of whether a person was hit by the gunfire; 2) other intentional shootings, regardless of the target, if any

person was struck or injured by the gunfire; and 3) unintentional shootings if a person other than the possessor of the discharged firearm was struck or injured by the gunfire.

While a change in law enforcement statistics measured only year to year is rarely informative, the reduction in the number of yearly shootings shown above reflects a reduced rate that has been repeated now for multiple years since reform efforts commenced.

All Deputy Involved Shootings which take place in Los Angeles County and which result in injury or death are submitted by the Sheriff's Department to the Los Angeles County District Attorney's Office for review. As of September 30, 2017, the Department reports it has submitted three 2017 shootings to the District Attorney.¹

In Custody Deaths

The OIG responded to the scene of four in-custody deaths which occurred between July 1 and September 30, 2017. Two deaths to which the OIG did not respond to the scene occurred in medical facilities.

One in-custody death was the result of a suicide. Five of the deaths appear to be from natural causes, although the medical etiology (cause) of the deaths has not yet been conclusively determined by the Medical Examiner.²

Office of Inspector General personnel have been permitted complete access to Department facilities and personnel during these investigations. The OIG attended the Custody Services Division administrative death reviews for each of these deaths,³ and continues to monitor the evaluative process of

¹ The Homicide Bureau also responds to and investigates officer involved shootings for many of the police departments within Los Angeles County.

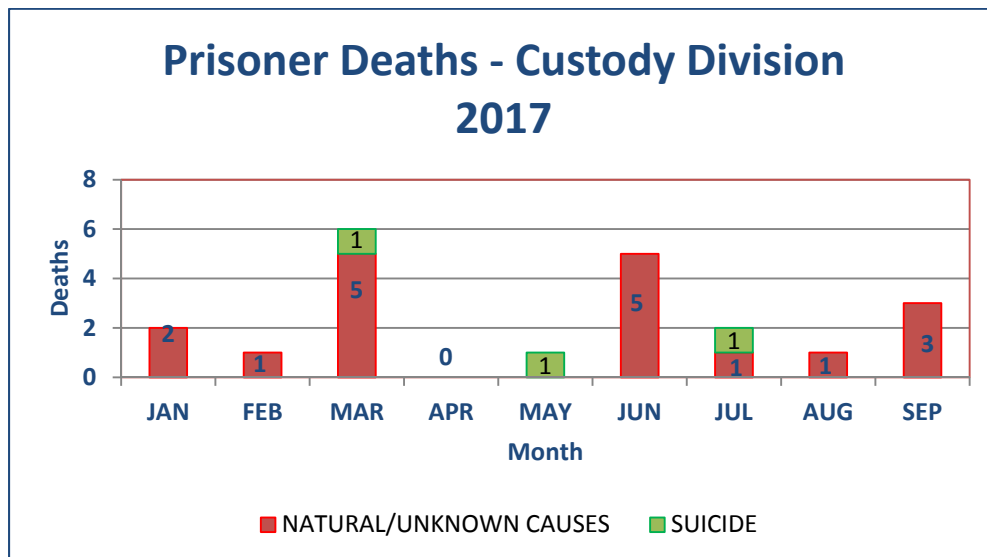
² The term natural causes is commonly used to indicate the cause of a death which was not the result of a suicide or homicide but due to a medical condition such as disease or organ failure.

³Section 4-10/050.00 of the Custody Division Manual (CDM) requires the Department to conduct a death review for each in-custody death or death of a prisoner in the Community Based Alternatives to Custody (CBAC) program. The death review is conducted in three separate meetings: the 24-hour, 7-day and 30-day. According to the CDM, the 24-hour review shall be conducted by Medical Services Bureau (MSB) to share initial findings and to review the circumstances surround all in-custody deaths. The CDM states that both the 7-day and 30-day death reviews shall be conducted by the Custody Compliance and Sustainability Bureau (CCSB) to share additional findings and discuss the status of any corrective or preventive actions taken since the previous review.

the Department and the Department of Health Services. The medical and custody staff at the death reviews are generally candid and thoughtful in their assessments. This review process allows for a conscientious assessment by all involved in the delivery of health care to confined patients.

These deaths continue to raise concerns regarding the assessment of patients by medical and mental health staff, the provision of medical and mental health care, collaboration and communication between custody and Correctional Health Services (CHS) staff, provision of timely aid to patients in acute distress, the reduction in patient levels of mental health care and movement of patients between mental health housing and general population housing, communication failures involving the coordination of care with community providers, and the quality of safety checks.

These concerns are the subject of active efforts by health care providers and custody staff to improve conditions. The Department of Health Services reports that CHS is: (a) hiring more staff; (b) working with existing staff to implement new policies and procedures to improve assessments, access to care and timeliness of getting patients on appropriate medications and therapies; (c) improving manager oversight of movement of mental health patients; (d) augmenting the quality improvement infrastructure within the jail to mimic a high community based standard; (e) working to coordinate care between the jails and community hospitals; and (f) designating specific, well trained staff to respond to in-custody emergencies.



Custody Operations

Office of Inspector General Site Assessments

OIG personnel conducted 55 total site visits to nine Los Angeles County custody and lockup facilities the third quarter of 2017. During the OIG's site visits, OIG monitors met with personnel at each rank in the Department's chain of command, from security and custody assistants to facility captains and commanders, and with civilian staff, clergy, and volunteers. OIG personnel met with prisoners in general population, administrative segregation, disciplinary and medical and mental health housing, as well as the Correctional Treatment Center. Monitors met with or received complaints from prisoners at cell front, during recreation and treatment group time, and in private interview rooms as necessary to ensure confidentiality. The following chart represents facilities visited from July 1, 2017, through September 30, 2017.

Facility	Site Visits
Criminal Justice Center Lockup	1
Century Regional Detention Facility (CRDF)	9
Inmate Reception Center (IRC)	6
Los Angeles County USC Medical Center	1
Men's Central Jail (MCJ)	18
North County Correctional Facility (NCCF)	3
Pitchess Detention Center (PDC) – North	3
PDC – South (and East)	3
Twin Towers Correctional Facility (TTCF)	11

Prison Rape Elimination Act Auditing

The Prison Rape Elimination Act (PREA), signed into law by President George W. Bush on September 4, 2003, was created to eliminate sexual abuse of both juveniles and adults who are confined in prisons, jails, station lockups and other detention facilities. In 2012 the United States Department of Justice issued PREA standards for the prevention, detection, and response to sexual abuse in confinement settings.⁴

⁴ Code of Federal Regulations, Title 29, Chapter I, Part 115.

Two Office of Inspector General monitors began the process of qualifying as PREA auditors pursuant to federal law (28 CFR 115.402(a)(2)), which authorizes the Office of Inspector General to serve as a PREA auditor. One monitor has completed the Department of Justice training, which includes conducting a mock audit of a correctional facility, and is in the process of becoming certified as a PREA auditor. The second monitor has completed the instructional phase and will soon conduct the mock audit which is required to qualify that monitor as a PREA auditor.

This role is complementary to the function OIG monitors already perform, in that they will collect qualitative information through conversations with staff and prisoners, make compliance findings based upon actual observations within the Department's facilities, identify weaknesses in Department policies and practices and recommend corrective action plans to the Department.

Citizen's Commission on Jail Violence Updates

CCJV Recommendation 3.12: The Department should purchase additional body scanners

Body scanner machines are an alternative to invasive strip searches which allow the Department to identify contraband before it enters the facility. The Citizen's Commission on Jail Violence (CCJV) recommended implementation of body scanners as an alternative to the indignity of cavity searches and to reduce the opportunities for personnel to engage in retaliatory strip searches. Prisoners refusing a body scan can always opt for a strip search. As part of a strip search, prisoners must remove their clothing to allow for a visual inspection of their person, including genitalia.

The Department continues to implement and utilize body scanner machines at the Pitchess Detention Center (PDC), which includes PDC – North facility, PDC – South facility⁵ and North County Correctional Facility (NCCF). The Department installed two body scanners at PDC – North on August 5, 2017. However, the Department has not initiated their use because personnel did not have required radiation badges, which allow the Department to monitor personnel exposure to radiation while operating the scanners. As of

⁵ PDC also houses PDC – East, a small facility which solely houses prisoners participating in the Fire Camp program.

September 30, 2017, the Department reported that it was awaiting delivery of those badges before it will begin operation of the body scanners.

The Department is currently conducting renovations to the Inmate Processing Area (IPA) at NCCF to allow for the installment of three body scanners. The Department's Facility Services Bureau received funding for renovations to NCCF's IPA on September 13, 2107. The Department reports that it is currently moving a laundry operation near the IPA to another part of the facility before it can begin renovation. The renovations will augment the layout of the IPA and surrounding areas to allow prisoners to easily flow through the body scanner machines before returning to their housing location. The Department reports that it will reserve space needed to conduct strip searches in the IPA should prisoners refuse to submit to a body scan.

The Department continues to utilize a body scanner at PDC – South facility, which was installed during September 2015. As reported by the OIG in the *2016 Second Quarter Status Report*, the Department has experienced high rates of body scan refusals. Shortly after implementation of the body scanner in late 2015 and early 2016, refusal rates at PDC – South facility fluctuated between 60 and 70 percent. In June 2016, the Department reportedly began enforcing work contracts against prisoner workers, which state that those prisoners will obey all jail rules and thus submit to body scans. Thereafter, the Department reports that it worked with staff from the Education-Based Incarceration (EBI) unit, to ensure that prisoners enrolled in EBI programs were following jail rules and submitting to a body scan. As a result, the body scan refusal rate for June 2016 at PDC – South facility dropped to 35.5 percent during June 2016.⁶ Since then, the Department has continued to see improved scan rates at PDC – South facility.

The average body scan refusal rate for 2017 year to date (January 1 through September 29) is 5.8 percent. The Department reports that based on

⁶ At PDC – South, most prisoners participate in either work or educational programming, which requires them to sign a contract stating that they will obey all jail rules in exchange for work or education privileges (including accrual of "credits" for time served in custody). The Department can enforce these contracts at any time, meaning they can ensure that prisoners participating in work or education programs submit to a Department-ordered body scan. In addition, the Department can refuse to house prisoners at PDC – South, a facility with greater privileges than others, if prisoners do not submit to a body scan.

statistical tracking,⁷ body scan refusals consist largely of Latino prisoners who are returning from court, and who reside in the general population.⁸ As previously reported by the OIG,⁹ some prisoners may be refusing pursuant to a gang edict.¹⁰ Between September 18 and September 22, the Department reports that 117 out of 118 refusers stated that their refusal was due to gang politics. The Department reports that, based on contraband intercepted at the facility, most of the drugs that enter the facility are coming from prisoners returning from court.

While prisoners have the right to refuse body scans, the Department should be situated to mitigate the presence of contraband in its facilities, especially at PDC – South, where the presence of drugs is particularly problematic. PDC – South facility is moving toward becoming a re-entry facility. Most prisoners at PDC – South facility demonstrate dedication toward their rehabilitation and re-entry programs, including substance abuse programs. The presence of drugs may pose barriers to their success individually and to rehabilitative programs generally. The Department reports that it is already developing strategies to address these issues. The OIG will continue to monitor the Department’s efforts in this area.

⁷ The Department tracks the following information related to body scanner refusals: the race of the refusing prisoner, the reason the prisoner is subject to search (court returnee, work program returnee or new arrival to the facility) as well as the reason stated by the prisoner for their refusal.

⁸ The most recent report of these statistics, from the week of September 18 – 22, 2017, states that out of a total 118 refusals, 116 refusals were made by Hispanic prisoners returning from court.

⁹ See the OIG’s 2014 report, *Analysis of the Legal Basis for X-Ray Body Scanner Searches in County Jail Facilities*, available on the OIG website at:

<https://oig.lacounty.gov/Portals/OIG/Reports/Analysis%20of%20the%20Legal%20Basis%20for%20X-ray%20Body%20Scanner%20Searches.pdf>

¹⁰ Id.

CCJV Recommendation 4.12: LASD should create an Internal Audit and Inspection Division

CCJV Recommendation 6.03: Deputies and supervisors should receive significantly more Custody specific training overseen by the Department's Leadership & Training Division

CCJV Recommendation 6.05: Deputies and supervisors should receive significantly more Custody specific training overseen by the Department's Leadership & Training Division

CCJV Recommendation 7.01: The investigative and disciplinary system should be revamped

CCJV Recommendation 7.06: IAB should be appropriately valued and staffed by personnel that can effectively carry out the sensitive and important work of that bureau

CCJV Recommendation 7.08: Each jail should have a Risk Manager to track and monitor use of force investigations.

The Inspector General is currently working with the Chief Executive Officer, the Sheriff, and the Auditor-Controller to memorialize a shared understanding of the specific intentions of the CCJV staffing recommendations, identify criteria and processes which can be used to determine whether the Sheriff's Department is meeting the intent of the CCJV's recommendations and review the implementation status of the CCJV's staffing recommendations based upon the agreed upon criteria and processes.

CCJV Recommendation 7.14: The grievance process should be improved to include added checks and oversight

The routine presence of OIG monitors in the jails allows for monitors to see firsthand the Department's efforts to improve their grievance system. OIG monitors report that overall the Department has improved its collection and processing of grievances and requests. However, OIG monitors regularly encounter prisoners who report that they did not receive dispositions of their grievances, especially upon movement between facilities. The OIG recommends that the Department closely monitor the distribution of prisoner grievance and request dispositions, especially when prisoners move between LASD facilities.

Currently, the Department is conducting its second pilot program for iPad implementation. Through the iPads, prisoners can immediately access information, including court dates, release dates, sentence status, and account balances, among other information. The iPads will not process

grievances until the Department builds the capacity to first process requests through the iPads. The Department began the pilot project at Men's Central Jail on September 5, 2017, by installing twenty iPads on the 2000 floor. Due to connectivity issues, some iPads were unable to record data; approximately twelve iPads stayed online reporting data continuously. As of October 2, 2017, the Department reports that it processed 19,772 requests through the pilot program iPads. The ability to provide these automated responses to prisoners' requests for information preserves Department resources because personnel no longer need to manually input and process requests through the Custody Automated Reporting and Tracking System (CARTS). Prisoners at Men's Central Jail (MCJ) report positively about the features and accessibility of the iPads to the OIG.

The purpose of the pilot program was to expose issues related to iPad implementation for prisoner requests and resolve those issues before deploying iPads to all facilities.¹¹ The pilot program at MCJ will last approximately ten weeks before the installation team moves onto Century Regional Detention Facility. The OIG will continue to monitor the deployment of additional iPads throughout all facilities.

On August 11, 2017, the OIG obtained access to the Custody Automated Reporting and Tracking System (CARTS) which tracks custody grievances among other functions. As of September 29, 2017, the OIG still has limited access to the system. The Department reports that it is currently working on getting the OIG full access to all CARTS modules.

Notably, based on the information obtained through CARTS, the Custody Division successfully resolved twenty complaints this year through conflict resolution, an alternative to the traditional grievance process. Conflict resolution is a way to mediate complaints whereby the complainant and the staff member complained of can resolve their differences through dialogue. After a successful verbal resolution, the Department need not conduct an investigation of the complaint and therefore minimize the associated

¹¹ This pilot program was the Department's second attempt to deploy iPads through a pilot program at Men's Central Jail. For more information on the first pilot program, see the OIG's report, *Reform and Oversight Efforts October 2016*, under "2016 Third Quarter CCJV Status Update."

administrative burdens. Conflict resolution works best for “tough to prove” complaints, such as those for discourtesy and bias.

Between January 1 and August 30, 2017, the Custody Division resolved complaints through conflict resolution on twenty occasions (thirteen at NCCF, five at CRDF and two at the Inmate Reception Center). The OIG recommends that all facilities, especially Men’s Central Jail and Twin Towers, with high numbers of grievances and requests received, consider conflict resolution where appropriate, as a practical solution to complaints against staff for discourtesy and bias.

CCJV Recommendation 7.15: The use of lapel cameras as an investigative tool should be broadened

As previously reported the Department opted for an alternative implementation of this recommendation and embarked on a five year program to install fixed cameras in the jail facilities. The Department also reported that because of the low quality of the captured video at five frames per second, the speed required to allow storage of two years of historical video recording from each camera, cameras were set to record at ten frames per second, which allowed retention of only one year of video but provided the higher resolution required to accurately depict the often-times rapidly evolving events in the jails.¹²

Throughout this quarter the Office of Inspector General conducted an audit of the status of this implementation plan. The results of this audit are contained in the Office of Inspector General’s Evaluation of the Implementation of Fixed Cameras in the Los Angeles County Jails report, a companion report to this report.

COMMUNITY CONTACTS

The OIG continues to regularly communicate with the public, the Board of Supervisors, the Civilian Oversight Commission and the Sheriff regarding the work of the OIG and the Department’s operations.

¹² 2015 First Quarter Status Report: The Los Angeles County Sheriff’s Department Implementation of The Citizen’s Commission on Jail Violence Recommendations, County of Los Angeles Inspector General, April 2015, pp. 19-20.

OIG staff members regularly attend and participate in meetings with concerned community members, including the meetings of the Public Safety and Justice Committee of the Empowerment Congress. The OIG also attended the monthly meetings of the Los Angeles County Sheriff Civilian Oversight Commission.

The Inspector General or a member of his staff attend all Board proceedings which effect or touch on the Department’s operation.

The OIG received fifty one new complaints in the third quarter of 2017 from members of the public, prisoners, prisoners’ family members and friends, community organizations and County agencies. Each complaint was reviewed by OIG staff. Eighty five of these complaints were related to the conditions of confinement within the Department’s custody facilities, as shown below.

Complaint/ Incident Classification	Totals
Personnel Issue	
Use of Force	1
Rude/Abusive Behavior	2
Failed to Take Action	1
Discrimination	3
Medical/Dental Issue	15
Disability Accommodations	8
Mental Health Services	6
Housing	3
Dietary	2
Other Service Issue	10
Total	51

Nineteen complaints were related to civilian contacts with Department personnel by persons who were not in custody. The classification totals do not equal the number of complaints because some of the complaints address multiple issues.

Complaint/ Incident Classification	Totals
Personnel Issue	
Use of Force	1
Rude/Abusive Behavior	4
Unlawful Conduct	6
Failed to Take Action	2
Discrimination	3
Other Service Issue	3
No Discernable Issue	0
Total	19

Ten complaints were not about the Department or Department personnel and were referred to the appropriate agency or the complainant was directed to seek counsel.

The OIG received ten complaints from the Sheriff Civilian Oversight Commission. Seven were related to civilian contacts with Department personnel by persons who were not in custody. Three were related to contact with Department personnel by an individual in custody.

COC Complaint/ Incident Classification	Totals
Personnel Issue	
Previous Complaint	3
No discernable subject	1
Other Service Issue	4
No response after COC intake	2
Total	10

CONCLUSION

This quarterly report identifies some observations developed during the Office of Inspector General's regular monitoring of the Los Angeles Sheriff's Department and jail facilities. Other issues have been raised in previous reports or are being worked on in greater depth for upcoming reports. We encourage readers to refer to our website (oig.lacounty.gov) for more detailed information contained in past reports and to view new reports as they come out.



OFFICE OF THE SHERIFF



COUNTY OF LOS ANGELES

HALL OF JUSTICE

JIM McDONNELL, SHERIFF

October 27, 2017

Max Huntsman, Inspector General
Los Angeles County Office of Inspector General
312 South Hill Street, 3rd Floor
Los Angeles, California 90013

Dear Mr. Huntsman:

**RESPONSE TO THE LOS ANGELES COUNTY OFFICE OF INSPECTOR
GENERAL REPORT – REFORM AND OVERSIGHT EFFORTS:
LOS ANGELES COUNTY SHERIFF'S DEPARTMENT**

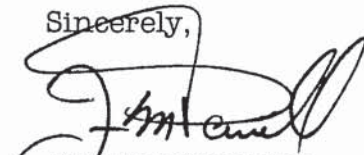
Attached is the Los Angeles County Sheriff's Department's (Department) response to the Los Angeles County Office of Inspector General's (OIG) final report entitled, "Reform and Oversight Efforts: Los Angeles County Sheriff's Department."

I thank you and your staff for your efforts in monitoring the various Department reforms. Amongst the topics discussed in your report are two that I wish to highlight. The responses to those recommendations are addressed in the attached document.

The effort and dedication made by members of the OIG to execute this report are greatly appreciated by the Department. The Department will continually strive to meet and/or exceed the recommendations of this report.

The Audit and Accountability Bureau has the responsibility to monitor and document the Department's response related to this evaluation. Should you have any questions regarding the Department's response, please contact Captain Steven E. Gross at (323) 307-8302.

Sincerely,



JIM McDONNELL
SHERIFF

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

A Tradition of Service
— Since 1850 —

RESPONSE TO THE LOS ANGELES COUNTY OFFICE OF INSPECTOR GENERAL
REPORT

COUNTY OF LOS ANGELES – SHERIFF

SUBJECT: REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY
SHERIFF'S DEPARTMENT

RESPONSE TO RECOMMENDATIONS BY THE OIG

1. The OIG recommends that the Department closely monitor the distribution of prisoner grievance and request dispositions, especially when prisoners move between Los Angeles Sheriff's Department facilities.

Response: Concur. We are exploring the feasibility of distributing grievance dispositions utilizing Department iPads, which would allow for more reliable tracking. As mentioned in your report, we are currently conducting our second pilot program for iPad implementation.

2. The OIG recommends that all facilities, especially Men's Central Jail and Twin Towers, with high numbers of grievances and requests received, consider conflict resolution where appropriate, as a practical solution to complaints against staff for discourtesy and bias.

Response: Concur. Conflict resolution is an option available to inmates at all of our facilities. Recognizing the value of this option, we will re-brief all facilities on the conflict resolution process. We also feel it is important to acknowledge that the process requires both the involved inmate and the involved employee to agree to participate in an interactive meeting; otherwise, the process cannot be utilized.