

**SECOND AMENDMENT TO
MEMORANDUM OF AGREEMENT BETWEEN
THE UNITED STATES AND THE COUNTY OF LOS ANGELES
REGARDING THE LOS ANGELES COUNTY PROBATION CAMPS
ENTERED INTO ON OCTOBER 31, 2008**

Second Amendment to the Memorandum of Agreement
Between the United States and the County of Los Angeles
Regarding the Los Angeles Probation Camps

I. INTRODUCTION

- A. On October 31, 2008, the parties entered into a Memorandum of Agreement (“MOA”) to resolve the Department of Justice’s investigation of alleged unlawful conditions at the Los Angeles County Probation Camps (“Probation Camps” or “Camps”), commenced pursuant to the Civil Rights of Institutionalized Persons Act, 42 U.S.C. § 1997 (“CRIPA”), and the Violent Crime Control and Law Enforcement Act of 1994, 42 U.S.C. § 14141 (“Section 14141”). The MOA was the result of a cooperative effort by the Department of Justice (“DOJ”) and the County of Los Angeles, the Los Angeles County Probation Department, and the Los Angeles County Department of Mental Health (collectively, “the County”) to guarantee and protect the federally protected rights of youth committed to the Probation Camps.
- B. MOA paragraph 48 requires that the County achieve and maintain substantial compliance with the terms of the MOA for a period of one year. The MOA further provides, at paragraph 62, that the MOA shall terminate four years from its effective date, or October 31, 2012. Accordingly, to fully satisfy the MOA, the County was required to reach substantial compliance with the MOA by October 31, 2011, and maintain this compliance until October 31, 2012. The parties jointly selected a Monitoring Team to evaluate and report on the County’s compliance. Under MOA paragraph 62, DOJ reserved the right to initiate a civil action pursuant to CRIPA and/or Section 14141 to enforce the MOA and protect the federal rights of youth if the County failed to fully satisfy the MOA within the four-year period.
- C. The County has implemented significant reforms in furtherance of the MOA, as reflected in the Monitoring Team’s biannual reports. Based on these reports, the County has achieved substantial compliance with all but four paragraphs in sections III through VI, which set out the substantive terms of the MOA (the substantive paragraphs). Despite these accomplishments, the County is unable to maintain one year of substantial compliance to fully satisfy the terms of the MOA by the bright-line termination date of October 31, 2012.
- D. In light of the County’s significant strides toward compliance and its ongoing commitment to reform, the parties agree to modify the MOA, pursuant to paragraph 72, as set forth below. The modification is intended to focus attention on resolving the MOA paragraphs not yet in compliance by eliminating the October 31, 2012 bright-line termination date and building on reforms already in place, as verified by the Monitoring Team’s most recent compliance evaluations. Section III of this Amendment clarifies the four remaining substantive paragraphs to achieve desired outcomes and facilitate ongoing compliance assessments. Section IV of this Amendment adds paragraph 73 to increase youth’s access to community-based services to promote rehabilitation, consistent with public safety and the best interests of youth.

II. AMENDMENTS TO SECTION VII OF THE MOA REGARDING MONITORING AND ENFORCEMENT

Pursuant to MOA paragraph 72, the parties hereby agree to modify the monitoring and enforcement paragraphs as follows:

- A. Termination and Enforcement: The parties agree to eliminate the four-year termination requirement of MOA paragraph 62. The parties further agree that the MOA may terminate on December 31, 2014, subject to the following conditions:
1. The County has maintained one year of substantial compliance with the following substantive paragraphs in sections III through VI of the MOA: 11, 13, 14, 16, 23, 24, 25, 26, 34, 42, 46, 58 and 59. Accordingly, these paragraphs are fully satisfied and shall terminate as of the effective date of this Amendment. Paragraph 59 has been deemed to be substantially compliant in prior Monitoring Reports. The County, consistent with the requirements of paragraph 59, shall continue to provide any newly created or revised policies to the DOJ, for review and approval for the duration of this agreement for any substantive paragraphs that have not yet completed the twelve-month substantial compliance monitoring period.
 2. The County must achieve substantial compliance with all remaining substantive paragraphs in sections III through VI of the MOA by December 31, 2013. The County will make all reasonable efforts to comply prior to this date.
 3. The MOA, as amended, will terminate when the County: (1) implements all paragraphs in MOA sections III-VI pursuant to paragraph 48, and (2) implements paragraph 73 as set forth in Section IV.A.9. The requirements of paragraph 48 shall not apply to paragraph 73. Should the County fail to implement this Amendment or otherwise fail to satisfy its terms, DOJ reserves the right to initiate a civil action pursuant to CRIPA and/or Section 14141, or take other appropriate enforcement action, to protect the constitutional and federal statutory rights of youth committed or supervised by the County.
- B. Implementation of Remaining Paragraphs: In accordance with the Monitoring Team's compliance assessments, and to ensure the full implementation and sustainability of reforms, the parties agree to the following implementation schedule for the remaining substantive paragraphs in sections III through VI of the MOA:
1. Paragraphs that Must Maintain Substantial Compliance: According to the Monitoring Team, the County has achieved substantial compliance with the following substantive paragraphs of the MOA: 9, 10, 12, 18, 19, 20, 21, 22, 27, 28, 29, 30, 31, 32, 33, 35, 36, 37, 38, 39, 40, 41, 44, and 45. The parties agree that the County has achieved substantial compliance with these paragraphs, but has yet to maintain one year of substantial compliance.

- a. If paragraphs 12, 18, 20, 21, 22, 27, 28, 29, 30, 31, 32, 33, 35, 36, 38, 39, 40, 41, 44, and 45 maintain substantial compliance through October 31, 2012, these paragraphs shall be fully satisfied and shall terminate as of that date.
 - b. For paragraphs 9, 10, 19, and 37, to ensure the sustainability of reforms, the parties agree that, notwithstanding the date on which each paragraph was deemed to be in substantial compliance by the Monitoring Team, the County shall maintain substantial compliance with each paragraph through December 31, 2012. The Monitoring Team shall continue to evaluate and report on the status of these paragraphs through December 31, 2012. Thereafter, based on the Monitoring Team's assessment, if the County has maintained substantial compliance by December 31, 2012, the paragraphs will no longer be subject to status reporting by the Monitoring Team, pursuant to MOA paragraph 54. The County agrees to continue to implement the policies, procedures, and practices related to these paragraphs for the life of the MOA to ensure that the constitutional and federal statutory rights of youth in the County's custody or supervision are upheld.
 - c. If any paragraph falls out of substantial compliance prior to termination of that paragraph, the County shall bring such paragraph into substantial compliance no later than December 31, 2013, and shall maintain such substantial compliance for a period of one year. The County shall make all reasonable efforts to bring all paragraphs into substantial compliance at the earliest possible date.
2. Paragraphs that Must Achieve Substantial Compliance: According to the Monitoring Team, the County has not achieved substantial compliance with the following substantive paragraphs of the MOA: 15, 17, 43, and 47. The County agrees to achieve substantial compliance with these paragraphs by December 31, 2013. Once substantial compliance is achieved, the County agrees to maintain one year of substantial compliance. The paragraphs will continue to be subject to status reporting by the Monitoring Team until each paragraph maintains one year of substantial compliance and is terminated. Any paragraph that does not achieve substantial compliance by December 31, 2013, shall be subject to enforcement under Section II.A.3 of this Amendment. To ensure the sustainability of reforms, the parties agree to retain paragraph 47 until such time as all other substantive paragraphs of the Agreement, except for paragraph 73, are in full compliance.
- C. All other monitoring and enforcement paragraphs in section VII of the MOA shall remain unchanged and in full force and effect for the life of this MOA, subject to further joint modification by the parties, pursuant to MOA paragraph 72.

III. AMENDMENTS TO SUBSTANTIVE PARAGRAPHS IN MOA SECTIONS III THROUGH VI

Pursuant to MOA paragraph 72, the parties agree to modify the following four substantive paragraphs to clarify expectations and facilitate ongoing compliance assessments by the Monitoring Team.

- A. **Paragraph 15, Staffing:** The County shall provide sufficient staff supervision to keep residents reasonably safe from harm and allow rehabilitative activities to occur successfully.
1. Direct care staff shall include only those staff members whose primary role is the direct supervision of youth.
 2. The County agrees to strengthen its current hiring practices by ensuring that all newly hired staff who have contact with youth in the County's juvenile justice system are subject to an appropriate hiring process and are otherwise qualified to work with youth. The hiring process shall include a background check, including a federal criminal history check and consultation of State and local child abuse registries, and a reference check. For current employees, the County shall either conduct criminal background record checks at least every five years or have in place a system for capturing such information. The County shall directly ask applicants for, and employees in, positions that result in contact with youth in the County's juvenile justice system, about prior criminal misconduct during interviews and reviews. The County shall ensure that employees have a continuing affirmative duty to disclose any criminal misconduct.
 3. On a monthly basis, the County shall gather and analyze data including, but not limited to, staffing ratios at each facility, vacancy rates, and staff turnover. The County shall adjust existing policies and practices as needed to comply with this paragraph based on analysis of this data.
- B. **Paragraph 17, Rehabilitation and Behavior Management:**
1. **Rehabilitation:** The County shall provide adequate rehabilitative and gender-specific programming, as necessary. The County shall continue to conduct appropriate individualized assessments by qualified staff.
 - a. The County shall develop and provide integrated treatment services that meet the rehabilitative needs of youth at all Probation Camps. These services shall adequately: (i) address youth's educational needs (including access to special education services); (ii) provide access to medical and mental health services, including substance abuse treatment; (iii) provide a structured living environment that facilitates, reinforces, and provides opportunities for youth to practice pro-social skills and pro-social relationships with other youth and adults; (iv) provide access to

meaningful recreational and enrichment activities; (v) provide opportunities for family involvement; (vi) encourage development of new skills; and (vii) include Camp staff as positive role models.

- b. Within 10 business days of a youth’s arrival at a Camp, the County shall ensure that the youth receives an individualized assessment of the youth’s rehabilitation needs by a multidisciplinary team in all relevant areas, including, but not limited to: education, recreation, psychosocial development, and mental health. This multidisciplinary assessment shall consider the Camps Assessment Unit’s (“CAU’s”) assessment of the youth. Based on this multidisciplinary assessment, the County shall formulate a comprehensive service plan, including case plan goals for rehabilitation and treatment, for each youth.
- c. The County shall ensure that each Camp offers the necessary rehabilitative treatment, programs, and services to meet the needs of youth housed there, consistent with safety and security needs, based on the assessments and treatment plans described in Section III.B.1.b., above. Such offerings shall include, but shall not be limited to, group therapy or individual counseling for each youth, as necessary.
- d. At Camps providing an adapted Dialectical Behavior Therapy (“DBT”) program, the County shall create a detailed program description for the DBT program to include, but not be limited to, the purpose; goals; desired results; target populations; expectations for staff training and program delivery; and type, intensity, and duration of services to be provided.
- e. In the Camps that do not offer DBT, the County shall implement an integrated treatment program that uses an interdisciplinary approach to identify and meet youth’s individualized rehabilitation needs.
- f. The County shall ensure that existing staff demonstrate competency, and new staff receive sufficient competency-based training, to fully implement the rehabilitative interventions in III.B.d and e.
- g. The County shall ensure that each rehabilitative treatment, program, and service at each Camp offers sufficient capacity to allow youth who need the treatment, program, or service to participate in it. The County shall ensure that youth attend their prescribed programs, as outlined in their treatment plans. The youth’s caseworker shall regularly report to the youth’s treatment team and document the youth’s progress in meeting his or her case plan goals. Youth who are not meeting their case plan goals shall receive prompt subsequent, individualized assessments and follow-up.

h. The County shall ensure that its rehabilitation and intervention programs continue to address youth's needs related to peer pressure and gang affiliation.

2. Behavior Management: The County shall provide a facility-wide behavior management system that is implemented throughout the day, including during school time. The behavior management system shall encourage meaningful rewards for positive behavior. Discipline and sanctions shall not be arbitrary. The County shall continue to develop the behavior management program in consultation with the Monitoring Team.

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this a. The County shall implement the behavior management system in
ce with the following schedule and based on the effective date of
Amendment:

(i) Within 30 days, the County shall complete detailed, written guidance for its behavior management system.

(ii) Within 60 days, the County shall provide staff with competency-based training on the behavior management system.

orientation
m (iii) Within 60 days, the County shall introduce the behavior management system to youth, including by providing youth with
and written guidance on the system and initiating the system in all Probation Camps. The written guidance shall be
ade available to youth in the dorm and at orientation thereafter.

specific, b. The County shall ensure that its behavior management system includes
consistent requirements and behavioral expectations for each part of the day during which youth can earn points. The County shall ensure that each segment of each day is consistently rated for all youth, every day, in every Probation Camp.

c. The County shall provide a comprehensive array of short- and long-term incentives at each Probation Camp and shall ensure that youth have access to all rewards and privileges to which they are entitled. The ability to purchase items from a store on a weekly basis may be part of this array, but it shall not be the only incentive offered.

d. The County shall use a continuum of individualized consequences in response to non-compliant behavior or rule violations at each Probation Camp. The County shall ensure that isolation may be used only as a last resort on this continuum, and only in response to violent or aggressive behavior; to prevent violent or aggressive or criminal behavior, including extreme and chronic disruptive behavior; or for the minor's own protection.

- i. The County, with input from the Monitors, shall draft and implement a policy that enumerates the types of behaviors that could result in a referral to isolation and requires detailed written justification for sending a youth to isolation, maintaining the youth in isolation, and removing the youth from isolation.
- ii. The County shall ensure that the period of isolation is based on the youth's behavior, or the threat to the youth, rather than on a pre-determined period. Youth who are in isolation must receive at least one hour of large muscle activity for every 24 hours in isolation, unless the youth is actively violent or aggressive, such that removing the youth from isolation presents a significant risk of harm to the youth or others. Youth whose isolation extends beyond 24 hours shall receive a due process hearing. The isolation policy shall be subject to DOJ review and approval.

3. As part of its evaluation to determine whether the implementation of paragraph 17, as amended, is meeting the rehabilitation needs of youth and contributing to improved conditions, the Monitoring Team shall consider factors including the following, as appropriate:

- (i) Use of isolation and reasons thereof;
- (ii) Rate of youth-on-youth and youth-on-staff violence;
- (iii) Progress toward meeting treatment goals as determined by the multidisciplinary team ("MDT");
- (iv) Youth transfers to other Probation Camps for security or safety purposes;
- (v) Rate of self-harming behaviors;
- (vi) Number of youth sent to outside facilities for mental health
tion or treatment;
- (vii) Use of behavior management rewards and consequences; and
- (viii) Number of early or on-time releases.

C. **Paragraph 43, Substance Abuse:** The County shall develop and implement policies, procedures, and practices to address substance use disorders appropriately. The County agrees to take the following steps:

- 1. Identify youth with substance abuse disorders.
- 2. Ensure that youth who (1) have a confirmed substance abuse diagnosis/disorder or (2) are otherwise identified as needing substance abuse treatment, receive substance abuse treatment. If a youth refuses treatment, the County shall document the refusal and make reasonable attempts to re-direct the youth back to treatment.

3. Reevaluate for a substance abuse disorder/diagnosis any youth who has not been identified as having such a disorder/diagnosis, upon determination that the youth falls into one of the following categories:
 - a. youth has a positive screening on the substance abuse scale of any screening or assessment measure used by the County;
 - b. youth self reports a significant history of substance use;
 - c. youth has used illegal drugs at the Camps or in County custody; and/or
 - d. youth has been referred for substance abuse treatment by staff.
4. Ensure that each Camp offers evidence-based substance abuse treatment services or programs by:
 - a. identifying the evidence-based treatment service or program to be used at each Camp;
 - b. implementing the service or program at each Camp; and
 - c. ensuring that the service or program has sufficient capacity to ensure that all eligible youth at each Camp may participate.
5. Take reasonable steps to prevent youth from having access to illegal drugs at the Camps.
6. As part of its evaluation to determine whether the implementation of paragraph 43, as amended, is addressing the substance abuse treatment needs of youth and contributing to improved conditions, the Monitoring Team shall consider the following factors, as appropriate:
 - a. number of incidents of youth previously treated for substance abuse treatment at the Camps who subsequently use illegal drugs at the Camps;
 - b. Progress toward meeting substance abuse treatment-related goals, as determined by the MDT;
 - c. Number of youth referred for substance abuse treatment;
 - d. Number of youth who complete substance abuse treatment programming;
 - e. Results of County-administered pre- and post-tests regarding substance abuse.

- D. **Paragraph 47, System:** The County shall continue to collect sufficient and reliable data to evaluate the implementation of the paragraphs of this Agreement. The County shall revise and/or institute quality assurance systems to ensure implementation of the paragraphs addressed in this Agreement. The County shall continue to analyze the data collected in its quality assurance systems and proactively and independently take corrective action, including adjusting the delivery and/or content of programs and collection of performance indicators, when results indicate that such action is needed.

IV. ADDITIONAL PARAGRAPH

Pursuant to MOA paragraph 72, the parties hereby agree to add paragraph 73 to the MOA. As set forth below, the County agrees to promote the rehabilitation of youth by increasing access to community-based alternatives, consistent with public safety and the best interests of the youth.

- A. **Paragraph 73, Increased Access to Community Alternatives:** To ensure that treatment and services referenced in the MOA are provided in the least restrictive setting, consistent with public safety, the best interests of the youth, and the goal of rehabilitation, the County agrees to take the following steps:

1. **Minimize Juvenile Hall Confinement:** The County shall rely on juvenile hall confinement only for youth who pose a risk to public safety and where the utilization of a less restrictive environment such as home, housing with a relative, assignment to the Community Detention Program, or assignment to a home that provides temporary overnight housing based on the youth's status such as a Pre-Detention Alternative (for youth pending a detention hearing) or a Status Offender Detention Alternative (for youth who is considered to be a non-delinquent status offender), is not appropriate. The following pre-detention alternatives, conducted by qualified staff, or local police agencies, as appropriate, shall be considered for youth prior to juvenile hall detention as appropriate:
 - a. **Divert Minors from the Juvenile Justice System:** Local law enforcement agencies should consistently be encouraged to consider counsel and release for first-time, low-risk offenders to parents, guardians, or other responsible adult in lieu of formal arrest and filing of criminal charges;
 - b. **Availability of Community Based Services:** Probation shall schedule in-service collaborative events with local law enforcement agencies and introduce them to the availability of community-based services to which youth and their families can be referred for assistance/service in lieu of arrest and/or detention. For example, youth could be referred to the local School-Based Probation Officer who will work with the youth and his/her family and align him/her with services as well as provide informal supervision to the youth while attending school.

- c. Intake and Detention Control Officers shall, after conducting a risk assessment utilizing an evidence-based screening tool, consider the following interventions options for youth:
 - i. Cite-back and release to parents, guardians, or other relatives with a future court date within 60 days;
 - ii. Community Detention Program with electronic monitoring pending court hearing; or
 - iii. Detain in juvenile hall due to gravity of offense, screening results, or bench warrant that requires detention pending court hearing in accordance with state law.

2. Minimize Camp Confinement: Prior to the pre-plea being accepted or the petition being sustained, the County shall evaluate all placement options and recommend Camp confinement only for youth who pose a legitimate risk to public safety and where the utilization of a less restrictive environment (e.g., home on probation; housing with a court-approved relative, while on probation; or a specialized community placement, while on probation) is not appropriate. The following pre-Camp-assignment review processes, conducted by qualified staff, shall be used prior to clearing a youth for Camp assignment:
 - a. Court Reports: Prior to Disposition, the County shall ensure that Probation staff completes a detailed assessment of the youth that will include pertinent, available information about the youth to produce a detailed recommendation to the court regarding the youth's most appropriate disposition in the least restrictive setting, consistent with public safety, the best interests of the youth, and the goal of rehabilitation.
 - b. Overview of Alternatives to Incarceration for Lower-level Offenders: Probation shall actively collaborate (on an on-going basis) with Bench Officers (judges) and affirm the availability of a formal grant of Community-Based Probation that will be enhanced through referral to community-based services for youth and their families for assistance/service/support as an alternative to incarceration.
 - c. Out of Home Screening Unit: All court reports recommending Camp Community Placement ("CCP") shall be reviewed by the "Out of Home Screening Unit." This unit shall assess these recommendations and determine the appropriateness of the recommendation. This unit shall endeavor to recommend placement of youth in community-based alternatives to incarceration to the maximum extent possible.
 - d. Camps Assessment Unit: Upon the court issuing an order for CCP, the CAU shall review the recommendation for appropriateness, review the minor's case

file, consult with mental health, education and health services and determine the most appropriate Camp placement for the youth consistent with public safety, the best interests of youth, and the goal of rehabilitation, and assign the youth to that Camp.

3. In-Camp Services/Re-entry: The County shall ensure that youth assigned to the Camps receive the following services, that are consistent with the County's goals of ensuring the public safety and rehabilitation of youth, and to ensure that youth are confined to Camps for no longer than necessary:
 - a. Each youth shall receive an initial MDT Assessment within fourteen (14) days of arrival at the Camp:
 - i. The MDT shall further review the documentation that resulted in the youth's CCP. If the CCP order appears to be contrary to the youth's treatment and service needs, or if the particular Camp assignment appears to be inappropriate, the case will be referred back to the CAU for consideration; and
 - ii. This collaborative MDT of Probation, the Department of Mental Health (DMH), Juvenile Court Health Services (JCHS) and Los Angeles County Office of Education (LACOE) representatives shall determine the in-Camp programming and service needs of youth, and facilitate initiation of the case plan and community transition plan for the youth;
 - b. Each youth's assigned Probation Officer at the Camp shall:
 - i. Meet with the youth upon the case plan being initiated;
 - ii. Meet regularly (weekly) thereafter with the youth (and the family, in person or via telephone or other available means, to the extent reasonably possible consistent with the youth's needs and/or case plan) and shall monitor and document weekly, the youth's progress and compliance with the case plan while in Camp;
 - iii. Closely monitor the youth's behavior and progress to determine eligibility for an early release recommendation to the court to assure that youth are not incarcerated in Camp for any longer than necessary. Upon the youth achieving a specific number of "made" days during which the youth was compliant with the Behavior Management Program, or as otherwise appropriate, the youth will be calendared for an MDT review at the camp. At the MDT, the youth's performance and other factors will be considered, including post-camp community placement and service issues, and a decision will be made regarding whether to petition the court for

an early release. Upon a decision being made to petition the court for early release, a Transitional MDT will be initiated; and

- iv. In instances where the youth appears eligible for early release:
 - 1) make the appropriate recommendation to the court; and 2) alert the facility's MDT Coordinator regarding the potential early release.

- c. Each facility shall have a designated MDT Coordinator who shall coordinate discharge transition planning. The MDT Coordinator shall:
 - i. Use MDT data to initiate community transition planning, and meet with the youth, and his or her family as appropriate, within 30 days of the youth's arrival to initiate the youth's transition plan.

 - ii. Collaborate with Probation Officers in Camp regarding transition plans for individual youth, and ensure that these plans meet the service needs of youth who are transitioning home or to the community;

 - iii. Coordinate a Transitional MDT with Aftercare Transition Program Probation Officers to initiate the transition process for the youth's transition back to the community. This process should include ensuring that these transition plans are consistent with the youth's service needs, and coordinating pre-release contacts to the Camp by the designated community Probation Officer at least 30 days prior to the youth's release from Camp. The Aftercare Probation Officer and youth's family shall be involved in the transitional MDT process to the extent reasonably possible;

 - iv. Coordinate ongoing reviews of youth confined in Camps to evaluate and identify youth who otherwise may be eligible for early release;

 - v. Work with all necessary entities and individuals to secure the supports and services identified in the youth's reintegration plan upon the youth's release, with more intensive efforts as the youth's release date approaches. Special efforts shall be made to facilitate any specialized medical or mental health service needs (including immediate access to prescribed medications and working with parents/guardians to schedule contacts and appointments with mental health care providers), the initiation or reinstatement of Medicaid or Medi-Cal benefits upon release, school enrollment or referrals for GED services and/or job-related assistance, as applicable.

- vi. Coordinate the Transitional MDT process at the facility at least 30 days prior to the youth's anticipated release date.
 - vii. Collect and analyze monthly and annualized data regarding the number of youth identified for early release, the number of youth actually granted early release, and the number of days these youth who were released early did not remain in custody.
- d. A qualified Probation Officer shall conduct at least one pre-release home screening visit to the youth's post-Camp placement within 30 days prior to the youth's release from Camp;
4. Out of Camp Transition Services: The County shall ensure that a continuum of community-based services including, but not limited to, substance abuse treatment, mental health treatment, family support services, and educational services is available, as appropriate, to meet the needs of eligible youth in sufficient capacity consistent with the County's goals of ensuring the public safety and rehabilitation of youth.
- a. Probation community supervision services shall be provided by adequately trained Aftercare Transition Program Probation Officers at a level commensurate with the risk posed by youth transitioning into the community, who shall facilitate the service needs of youth and their families.
 - b. The community Aftercare Probation Officer shall:
 - i. Participate in the pre-release transition planning process for the youth;
 - ii. Ensure that the transition plan is consistent with the youth's service needs;
 - iii. Conduct at least two pre-release meetings with the youth, including at least one face-to-face meeting where reasonably possible, or video conference where necessary, at least 21 days prior to the youth's release from Camp;
 - iv. Coordinate with family or community placement for the youth to assure awareness of: 1) anticipated date of release, 2) the post release transition plan, and 3) the youth's service needs;
 - v. Facilitate the youth's reintegration into the community and collaborate with community service providers, including educational providers, and coordinate referrals to mental health providers;
 - vi. Conduct an in-person meeting with the youth and youth's family within three (3) working days after the youth's release from Camp;

- vii. Conduct a home visit within 30 days after the youth's release from Camp; and
 - viii. Monitor and document, through regular face-to-face visits in the community, the youth's behavior and progress with both the transition plan and the case plan and provide intervention services as appropriate, which may include adjustments to the case plan to facilitate compliance with conditions of probation and rehabilitative efforts.
5. Community-Based Alternatives to Incarceration: The County shall ensure the availability of, and referral to, a continuum of community-based alternatives to incarceration, in sufficient capacity throughout the County to serve all appropriate youth in their communities of residence, including, but not limited to, youth with disabilities and youth with mental health needs, to the extent reasonably possible, consistent with the County's goals of ensuring the public safety and rehabilitation of youth.
- a. The County Probation Department shall ensure the availability of the following services to enhance youth's access to community-based alternatives:
 - i. probation services, in a range of supervision levels, commensurate with the risk posed by youth, and a sufficient number of adequately trained staff to facilitate the youth's case plan;
 - ii. non-secure residential services, including supervised independent living programs, respite, specialized foster care, and group homes; and
 - iii. three (3) individual Day Reporting Centers ("DRCs") to serve youth in the community. One (1) DRC is currently open and an additional two (2) DRCs will be opened.
 - b. The County Probation Department shall take all reasonable steps to refer youth to community-based services that are outlined in a youth's case plan. Special efforts shall be made to address any specialized medical or mental health service needs and to establish medical benefits. Referrals shall include, but shall not be limited to, the following services or resources:
 - i. Substance abuse treatment; mental health treatment, including crisis intervention services; family services; educational support, including school enrollment and GED services; employment support; vocational support; and services to meet the needs of youth with complex medical needs or developmental delays; and
 - ii. Regional Occupation Centers and other similar centers.

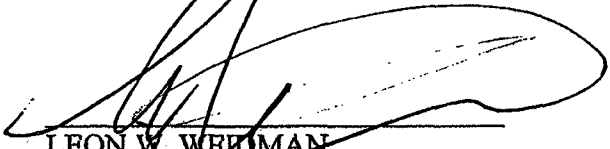
6. External Partnership: The County agrees to engage an external research entity to conduct a longitudinal study and develop baseline data tracking systems to assist in evaluating systemic outcomes for youth. This collaboration is intended to improve the timeliness, coordination, and effectiveness of Probation services for youth who come in contact with the juvenile justice system, and their families. The study shall assess youth outcomes in both Camp and alternative settings.
 - a. At a minimum, the study shall assess the following factors:
 - i. One-year recidivism/arrest rates; school graduation rates or GED achievement; employment; substance abuse treatment service availability and participation; drug-testing participation and results; stability of living situation, including family relationships; and youth self-reports regarding success in his/her home community, which may include self-reported drug use in the community.
 - ii. The role of aftercare in youth's post-placement experience, including ways to enhance the design and resources of the aftercare system.
 - b. The study shall identify gaps in capacity and services to youth that may contribute to youth being committed to the Probation Camps.
 - c. The study shall identify solutions and best practices to overcome or reduce identified obstacles or gaps in service delivery to optimize effective rehabilitative opportunities for youth in their home communities.
7. Quality Assurance: The County shall develop and implement a quality assurance monitoring tool to assess compliance with items 1-5 of paragraph 73, and shall take steps as appropriate to overcome or reduce any identified obstacles or gaps that prevent it from serving all otherwise qualified youth in their home communities.
8. The County shall, as appropriate, provide necessary support and funding to facilitate the implementation of paragraph 73.
9. Paragraph 73 shall terminate once the County has fully implemented paragraph 73, as verified by the Monitoring Team. The County shall endeavor to fully implement paragraph 73 by December 31, 2014, so as to resolve this matter in this entirety.



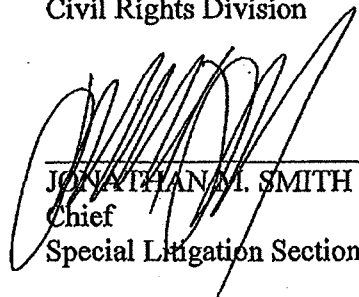
ANDRE BIROTTE JR.
United States Attorney
Central District of California

FOR THE UNITED STATES:

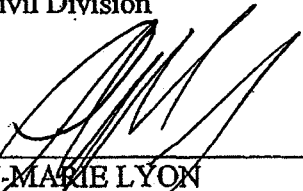
THOMAS E. PEREZ
Assistant Attorney General
Civil Rights Division



LEON W. WHITMAN
Assistant United States Attorney
Chief, Civil Division



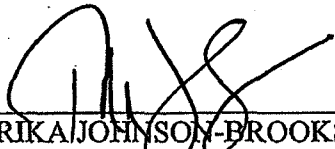
JONATHAN M. SMITH
Chief
Special Litigation Section



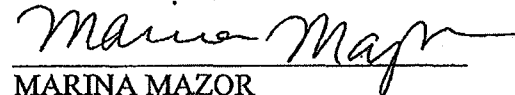
ROBYN MARIE LYON
MONTELEONE
Assistant United States Attorney
Assistant Division Chief
Civil Rights Unit Chief, Civil Division



LUIS E. SAUCEDO
Acting Deputy Chief
Special Litigation Section



ERIKA JOHNSON-BROOKS
TERRENCE JONES
Assistant United States Attorneys

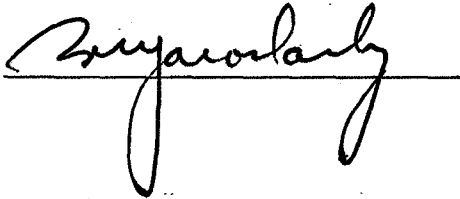


MARINA MAZOR
REGINA M. JANSEN
Trial Attorneys
Special Litigation Section

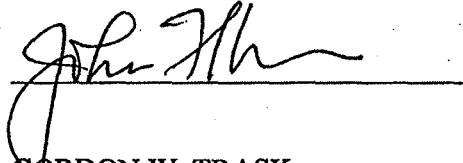
Executed this 18th day of October, 2012

**FOR THE COUNTY OF LOS
ANGELES:**

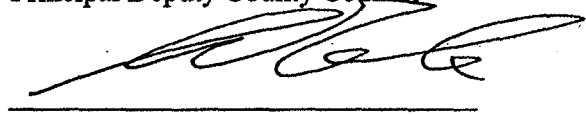
ZEV YAROSLAVSKY
Chairman of the Board of Supervisors

A handwritten signature in cursive script, appearing to read "Zev Yaroslavsky", written over a horizontal line.

JOHN F. KRATTLI
County Counsel

A handwritten signature in cursive script, appearing to read "John F. Krattli", written over a horizontal line.

GORDON W. TRASK
Principal Deputy County Counsel

A handwritten signature in cursive script, appearing to read "Gordon W. Trask", written over a horizontal line.

Executed this 24th day of October, 2012