

# Los Angeles County Sheriff's Department

Audit and Accountability Bureau



## Inmate Grievances Audit

Custody Services Division–  
Specialized Programs  
Century Regional Detention  
Facility

Audit No. 2019-6-A



Alex Villanueva, Sheriff

March 3, 2020

**LOS ANGELES COUNTY SHERIFF'S DEPARTMENT**  
**Audit and Accountability Bureau**

**INMATE GRIEVANCES AUDIT**  
**CUSTODY SERVICES DIVISION - SPECIALIZED PROGRAMS**  
**CENTURY REGIONAL DETENTION FACILITY**  
**Project No. 2019-6-A**

**PURPOSE**

The Audit and Accountability Bureau (AAB) conducted the Inmate Grievances Audit - Custody Services Division – Specialized Programs – Century Regional Detention Facility under the authority of the Sheriff of Los Angeles County. The audit was performed to determine how the Los Angeles County Sheriff's Department (Department) Century Regional Detention Facility (CRDF) adhered to Departmental policies and procedures related to the processing, investigation, and response to inmate grievances. This audit satisfied, in part, the requirements of the Citizens' Commission on Jail Violence (CCJV) recommendations and provisions related to the implementation plan of the *Rosas Settlement Agreement* (Agreement).<sup>1</sup>

The AAB conducted this audit under the guidance of Generally Accepted Government Auditing Standards.<sup>2</sup> The AAB determined the evidence obtained was sufficient and appropriate to provide a reasonable assurance based on the audit objectives.

**BACKGROUND**

In 2012, the Los Angeles County Board of Supervisors, in response to the *Rosas* federal class-action lawsuit alleging the Department condoned a long-standing and widespread pattern of violence by deputies against inmates in the jails, convened the CCJV to investigate these allegations. The civil action resulted in the Agreement and implementation plan which included recommendations addressing training, reporting, and tracking incidents involving uses of force as well as inmate requests and grievances. Prior to the Agreement, the Department collected, tracked, and addressed inmate grievances in a manner found to be insufficient by the CCJV.

As a result of the Agreement's recommendations, the Department's inmate grievance policy was revised and resulted in the creation of Volume 8 of the Department's Custody Division Manual (CDM).<sup>3</sup> The revised policy expands upon the manner in which Form SH-J-420 (Inmate Grievance Form, attachment 1) is assigned, tracked, and investigated.

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<sup>1</sup> On September 26, 2014, then Sheriff John L. Scott entered into a Settlement Agreement regarding Alex Rosas, et al. v. Leroy D. Baca, Case No. CV 12-00428 DDP.

<sup>2</sup> United States Government Accountability Office, Government Auditing Standards, (July 2018).

<sup>3</sup> The CDM Section 8-01/000.000, Preamble to the Inmate Grievance Policy (Non-Medical/Non-Mental Health), (July 2016), states the purpose of the inmate grievance policy is to establish and maintain a fair, objective and effective grievance process through which resolutions of inmate grievances are achieved at the lowest possible administrative level with timely responses to the aggrieved, and affording reasonable opportunities to appeal to the next level of review.

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An Inmate Grievance is defined by the CDM as any action, condition, or omission by the Department or its staff that the inmate believes is having an adverse effect on his or her safety or welfare. Per Department policy, Inmate Grievance forms are to be reasonably available to inmates in order to facilitate submission of these complaints so they may be addressed in a timely manner. A Department member of no lesser rank than a sergeant is required to collect these forms and immediately address any grievance that may be considered an emergency and notify the watch commander. The remaining grievance forms are placed in a receptacle for the Inmate Grievance Teams<sup>4</sup> retrieval. The Inmate Grievance Team will assign an investigator or forward the grievance, if necessary. The Inmate Grievance Team is also responsible for data entry into the Custody Automated Reporting and Tracking System (CARTS).<sup>5</sup>

Requisite timelines are outlined in Volume 8 of the CDM, as well as procedures for extending response due dates and processing inmate appeals. Per the CDM, the Division Inmate Grievance Coordinator<sup>6</sup> at Custody Support Services Bureau (CSS),<sup>7</sup> is responsible for coordinating the review of appeals, and communicates with each of the facilities, bureaus, and units regarding inmate grievances and Inmate Grievance Team activities.

By partnering with the court-appointed Agreement Monitors,<sup>8</sup> the Department has refined the policies and procedures regarding inmate grievances. These refinements have been made with the express purpose of ensuring the Department implements policy changes, adheres in practice to the policy changes, and conducts investigations of alleged or potential policy violations.

### **PRIOR AUDITS**

One Inmate Grievance audit has been completed to date. The previous audit, conducted at Men's Central Jail, Project No. 2017-9-A, yielded seven recommendations. Of these, four recommendations have been implemented and two are in progress. The remaining recommendation was not implemented, as the auditee did not concur.

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<sup>4</sup> The CDM Section 8-01/020.00 Responsibilities, (October 2018), states the Inmate Grievance Teams shall be responsible for reviewing, categorizing, tracking, and forwarding requests, grievances, and appeals to the appropriate person or unit for investigation and handling, and shall assist with responding to inmates as appropriate. In addition, they shall scan and enter all non-electronic grievances, general requests, and appeals forms they collect into CARTS, including collection times, and assign them reference numbers.

<sup>5</sup> CARTS is a data system designed to collect management information and facilitate the identification of deficiencies and trends. The data in CARTS varies from day to day based on continuous updates.

<sup>6</sup> The CDM Section 8-01/020.00 Responsibilities, (October 2018), states the Division Inmate Grievance Coordinator, at the minimum rank of lieutenant is assigned to Custody Support Services (CSS).

<sup>7</sup> The CDM Section 2-00/060.00 Custody Services Division – Administration, (May 2015), states the Custody Support Services Bureau provides administrative support, in-depth research, independent auditing, critical incident review, and policy development for the Custody Services Divisions.

<sup>8</sup> The presiding United States District Judge appointed monitors to develop and oversee Department compliance with the Agreement Implementation Plan.

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This is the first Inmate Grievance Audit conducted by the AAB at CRDF.

### **METHODOLOGY**

#### **Scope**

This audit encompassed four objectives:

- Objective No. 1 - Proper Identification and Classification of Grievances – To determine if the grievance was properly forwarded after initial review by the line sergeant. To determine if the grievance was properly categorized as Emergent or Non-Emergent upon the watch commander's receipt.<sup>9</sup>
- Objective No. 2 - Completeness of Grievance Investigations – To determine if the Unit Grievance Coordinator ensured investigations were completed reasonably within established timeframes and the inmates were notified of the results.
- Objective No. 3 - Timeliness – To determine if Emergency Grievances were investigated, resolved and responded to within five calendar days of the Department's receipt; to determine if written notification of modification from an emergency to a Non-Emergency Grievance was provided to inmates within five calendar days of the Department's receipt; to determine if Non-Emergency Grievances were investigated, resolved and responded to within 15 calendar days of the Department's receipt.
- Objective No. 4 – Appeals Process - To determine if notification of disposition of a Non-Emergency Grievance appeal was provided to the inmate within 15 calendar days of the Department's receipt of the appeal.

Source documentation included a review of all grievance categories assigned to CRDF within CARTS, inmate movement logs, inmate discipline logs, and CARTS access data logs. The CDM, specifically Volume 8, was utilized as the criteria for this audit. Auditors also evaluated compliance with Title 15, Section 1073, Inmate Grievance Procedures, and the recommendations from the Agreement which are required through the implementation plan and pertain directly to the scope of this audit.

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<sup>9</sup> An emergency grievance is defined as an urgent matter wherein a disposition according to the regular time limits could subject the inmate to immediate risk of death, personal injury, or irreparable harm... any aspects of an emergency grievance deemed not to be an emergency shall be subject to the general inmate grievance process and deadlines set forth in the Inmate Grievance policy. CDM Section 8-03/010.00, Emergency Grievances, (January 2018).

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#### **Audit Time Period**

The audit time period was from January 1, 2019 through April 30, 2019.

#### **Audit Population**

Auditors identified varying populations in order to examine the different aspects of the four objectives, which are described in the Audit Details and Results section of the report. Auditors excluded healthcare grievances which are assigned to Medical Services Bureau, and grievances against staff, which are the subject of another audit.

Auditors obtained a list of all Inmate Grievances submitted within all custody facilities during the audit time period. Within the list, auditors identified 2,251 Inmate Grievances submitted by inmates housed at CRDF. Auditors identified and removed Medical Grievances and Grievances Against Staff. From the remaining 395 Inmate Grievances, a statistically valid random sample of 88 was selected for review.<sup>10</sup> Seven grievances were deselected from this sample due to their status as duplicates. The duplicate grievances are analyzed in the Additional Information section of this audit. Eighty-one grievances were included in the sample population for this audit.

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<sup>10</sup> Using a statistical one-tail test with a 95% confidence level and a 4% error rate, a statistically valid sample was identified.

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**AUDIT DETAILS AND RESULTS**

**Objective No. 1 – Proper Identification and Classification of Inmate Grievances**

**Objective 1(a) – Grievances Properly Forwarded by Line Sergeant after Initial Review**

Criteria

Custody Division Manual, Section 8-03/010.00, Emergency Grievances, (January 2018), states:

*...Personnel receiving any Inmate Grievance Form marked as an emergency shall determine if the situation requires prompt action to protect the life or safety of the inmate or others, and, if so, shall take any appropriate action. Personnel shall give the emergency grievance to a sergeant and notify him or her of the situation without delay...*

*The sergeant shall promptly notify the watch commander of the emergency grievance, who shall confirm the emergency exists and, if so, shall ensure appropriate action has been taken to protect the inmate...After collecting a grievance in which the inmate is claiming his or her life is in danger, the sergeant shall expedite the process for determining if the grievance is an emergency by checking on the inmate's welfare and promptly notifying the inmate of the determination.*

Custody Division Manual, Section 8-01/020.00, Responsibilities, (October 2018), states:

**PRIORITY HANDLING**

*Line sergeants identifying priority grievances outlined in section 8-03/005.00, "Inmate Grievances" and emergency appeals, shall handle them as follows:*

- *In cases of an emergency, determine if the situation requires prompt action to protect the life or safety of the inmate, and, if so, shall take any appropriate action*
- *Promptly deliver the inmate request, grievance, and/or appeal to the watch commander*
- *Ensure a copy of the inmate request, grievance, and/or appeal is placed in a secured collection bin centrally located within each floor, area or building, pending retrieval and tracking by Inmate Grievance Team members.*

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*...All other requests and grievances shall be time stamped and placed in secured collection bins centrally located within each floor, area or building, pending retrieval by Inmate Grievance Team personnel.*

#### Procedures

Auditors reviewed the data within CARTS to determine how the inmate grievance was forwarded after the initial intake procedures by CRDF line sergeants. The population for this objective was lowered from 81 to 78, with three of the grievance packets excluded. Two were excluded due to the release of the inmate almost immediately after the grievance was received. One grievance packet was excluded due to the filing inmate exceeding her allowance of general grievance submissions.<sup>11</sup>

#### Results

Seventy-five of the 78 (96%) inmate grievances met the criteria for this objective. Three grievances did not meet the criteria. These grievances included two complaints regarding inmates missing the pill/medical line, and one that should have been downgraded as a request.

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<sup>11</sup> CDM Section, 8-04/050.00, Duplicate Filings of Grievances and Appeals, and Restriction of Filing Privileges, (September 2018), states: In accordance with California Code of Regulations, Minimum Standards for Local Detention Facilities, Title 15, Section 1073(b), and in order to avoid duplicate entries and the disruption of orderly and timely processing of grievances and appeals, inmates shall not submit additional grievances regarding the same topic without allowing sufficient time for a Department investigation and disposition of the original grievance. The Unit Commander, with the concurrence of the concerned chief, may restrict the inmate's grievance and appeal filing privileges to one (1) non-emergency grievance every fourteen (14) calendar days for a period of up to twelve (12) months.

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#### **Objective 1(b) – Grievances Properly Forwarded by Grievance Team after Initial Review by Line Sergeant**

##### Criteria

Custody Division Manual, Section 8-01/020.00, Responsibilities, (October 2018), states:

*Line sergeants identifying priority grievances outlined in Section 8-03/005.00, "Inmate Grievances" and emergency appeals, shall handle them as follows:*

- *In cases of an emergency, determine if the situation requires prompt action to protect the life or safety of the inmate, and, if so, shall take any appropriate action*
- *Promptly deliver the inmate request, grievance, and/or appeal to the watch commander*
- *Ensure a copy of the inmate request, grievance, and/or appeal is placed in a secured collection bin centrally located within each floor, area or building, pending retrieval and tracking by Inmate Grievance Team members.*

*...All other requests and grievances shall be time stamped and placed in secured collection bins centrally located within each floor, area or building, pending retrieval by Inmate Grievance Team personnel.*

##### Procedures

Auditors reviewed the data within CARTS to determine how the Inmate Grievance was forwarded after the initial intake procedures by the CRDF Grievance Team. The population for this objective was lowered from 81 to 75, with six of the grievances excluded. Three of the grievances did not meet standards in Objective No. 1(a) and excluded from this objective. The remaining three were the same exclusions for Objective No. 1(a).

##### Results

Sixty-eight of the 75 (91%) inmate grievances met the criteria for this objective. Seven grievances did not meet the criteria. The seven inmate grievances included five where an investigator was not assigned until weeks after the inmate's release and two Inmate Grievances which were routed to kitchen supervisors, but did not also route to CRDF line personnel for follow up or investigation.



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**Objective No. 1(c) – Inmate Grievance Properly Categorized as Emergent or Non-Emergent upon Watch Commander’s Receipt**

Criteria

Custody Division Manual, Section 8-03/010.00, Emergency Grievances, (January 2018), states:

*Personnel receiving any Inmate Grievance Form marked as an emergency shall determine if the situation requires prompt action to protect the life or safety of the inmate or others, and, if so, shall take any appropriate action... The sergeant shall promptly notify the watch commander of the emergency grievance, who shall confirm the emergency exists and, if so, shall ensure appropriate action has been taken to protect the inmate and to resolve the issues which gave rise to the emergency.*

*If it is determined an emergency does not exist, the watch commander or designated sergeant shall ... document why it was determined not to be an emergency. In addition, any aspects of an emergency grievance deemed to not be an emergency shall be subject to the general inmate grievance process and deadlines set forth in the Inmate Grievance Policy.*

Custody Division Manual, Section 8-01/020.00, Responsibilities, (October 2018), states:

*... Watch commanders presented with any of the requests, grievances, or appeals requiring priority handling shall review them with priority and ensure they are addressed in accordance with the procedures set forth in this policy...*

*All other requests and grievances shall be time stamped and placed in secured collection bins centrally located within each floor, area or building, pending retrieval by Inmate Grievance Team personnel.*

Procedures

Auditors examined all 81 Inmate Grievance Forms to ascertain if they had been properly classified by the watch commander as emergent or non-emergent. Twenty-nine of the Inmate Grievances were submitted as emergent by the filing inmate. The 52 remaining grievances were submitted as non-emergent. All 29 of the Inmate Grievances submitted as emergent were properly reclassified as non-emergent by the watch commander.

Results

All eighty-one (100%) of the grievances met the criteria for this objective.

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**Objective No. 2 – Completeness of Grievance Investigation**

Criteria

Custody Division Manual, Section 8-01/020.00, Responsibilities, (October 2018), states:

*Line sergeants identifying priority grievances outlined in Section 8-03/005.00, "Inmate Grievances" and emergency appeals, shall handle them as follows:*

- *In cases of an emergency, determine if the situation requires prompt action to protect the life or safety of the inmate, and, if so, shall take any appropriate action*
- *Promptly ensure a reference number has been issued through the Custody Automated Reporting and Tracking System (CARTS)*
- *Promptly deliver the inmate request, grievance, and/or appeal to the watch commander*
- *Ensure a copy of the inmate request, grievance, and/or appeal is placed in a secured collection bin centrally located within each floor, area or building, pending retrieval and tracking by Inmate Grievance Team members.*

Custody Division Manual, Section 8-01/020.00, Responsibilities, (October 2018), states:

**UNIT INMATE GRIEVANCE COORDINATOR RESPONSIBILITIES**

*Unit Inmate Grievance Coordinators shall be responsible for regularly tracking the facilities handling of inmate grievances to ensure the investigations are completed reasonably and within established time frames, and inmates are notified of the results of the investigations.*

*Unit Inmate Grievance Coordinators shall ensure all pertinent information regarding grievances are entered and tracked in CARTS and the entries reflect their nature and status of each grievance and personnel assigned to address the concerns.*

Custody Division Manual, Section 8-04/010.00, Dispositions, Interim Status Responses, and Inmate Notifications, (January 2018), states:

*Personnel assigned to handle inmate requests or grievances shall make a determination of an appropriate disposition based on information available and/or established through their investigative efforts.*

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Procedures

Auditors reviewed the grievance documentation and CARTS entries for the audit population. This involved a qualitative review of the steps the investigator took to resolve the grievance. The population for this objective was lowered from the sample of 81 to 73, with eight grievance packages marked as not applicable. Those not applicable to the objective included grievance packages where the inmate was released shortly after the grievance was submitted. One was excluded due to the inmate having exceeded her allotted general grievances allowance.

Results

Fifty-one of the 73 (70%) grievance packages met the criteria. The 22 packages that did not meet the criteria included investigations for complaints regarding canteen, inmate workers, living conditions, and inmate programs that are still open, significantly past deadlines with no progress on the investigations documented.

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**Objective No. 3 – Timeliness**

**Objective No. 3(a) - Inmate Notified of Emergency Grievance Modification within Five Calendar Days**

Criteria

Custody Division Manual, Section 8-03/010.00, Emergency Grievances, (January 2018), states:

*...If it is determined an emergency does not exist, the watch commander or designated sergeant shall notify the inmate as soon as practical, but not later than five (5) calendar days, that the grievance will be handled as a non-emergency grievance and document why it was determined not to be an emergency...*

Procedures

Auditors examined the 81 Inmate Grievance Forms to ascertain if they had been submitted as emergent or non-emergent. Fifty-two grievances were submitted as non-emergent. The remaining 29 grievances were emergent. Auditors reviewed the grievance documentation and CARTS entries to determine if the involved inmates were notified of the emergency grievance modification within the established five day time limit.

Results

Twenty-four of the 29 (83%) grievances met the criteria for this objective. The remaining five grievances had not documentation that a notification of modification was given to the inmate within the established five day time limit.

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**Objective No. 3(b) - Non-Emergency Grievances Completed within Established Time Frames**

Criteria

Custody Division Manual, Section 8-04/040.00, Time Frames, (July 2016), states:

Grievances

- *Inmate grievances shall be investigated, resolved, and responded to within fifteen (15) calendar days from the date the grievance was received by the Sheriff's Department, absent exceptional circumstances, which must be documented. (Refer to Section 8-04/040.05, "Extensions.") In cases wherein the inmate grievance cannot be resolved within this time frame, the inmate must be provided with a written response advising him or her of the status.*

Custody Division Manual, Section 8-04/040.05, Extensions, (July 2016), states:

Extensions for Requests and Grievances

*Under exceptional circumstances wherein the investigation of a request or a grievance cannot be completed within the established time frames, a supervisor of the minimum rank of sergeant, may extend the requisite response time by fifteen (15) calendar days. Examples of exceptional circumstances include:*

- *Unavailability of inmate(s), staff, or witnesses necessary to conduct an appropriate investigation;*
- *The nature of the investigation, decision, or action requires additional research;*
- *Necessary involvement of specialized units or other departments, agencies, or jurisdictions;*
- *An extended disruption of normal facility operations, including those affecting technological infrastructure;*
- *The investigation requires the interview of multiple witnesses.*

*Any additional extensions shall require the approval of the unit commander or designee, which shall be documented.*

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Procedures

Auditors examined 80 grievances out of the sample of 81, for this objective. One grievance was not processed by CRDF because the inmate exceeded her allotted general grievances allowance. This grievance was excluded from testing for the objective.

Auditors reviewed the grievance documentation and CARTS entries for the audit population to determine if the inmate's grievance was completed and responded to within the established time frame.

Results

Thirty-seven of the 80 (46%) grievances met the criteria for this objective. The remaining 43 were not resolved within the mandated time limit.

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**Objective No. 4 – Appeals Process**

Criteria

Custody Division Manual, Section 8-04/030.05, Appeals of Grievances - Not Against Staff, (January 2018), states:

*When an inmate submits an appeal regarding the adjudication of a non-medical or a non-mental health grievance, the appeal shall be subject to the following levels of review:*

*First Level Appeal Review*

- *First level appeals shall be reviewed by the respective unit commander, or a designee with a minimum rank of lieutenant. The inmate shall be advised, in writing, whether the appeal was upheld (granted) or denied, within fifteen (15) calendar days of the Department's receipt of the appeal. First level appeal reviews shall be coordinated by the Unit Inmate Grievance Coordinator.*

*Extensions of appeals that are not regarding grievances against staff shall require the approval of the concerned area commander. Refer to section 8-04/040.05, "Extensions."*

Procedures

The randomly selected sample of 81 Inmate Grievances for this audit did not contain any grievances that initiated the appeals process. Therefore, auditors returned to the larger population of 395 grievances for the time period to search for those that included an appeal. Auditors found two grievances that included an appeal. Both of these grievances were evaluated to determine if the appeal had a disposition within 15 calendar days of the Department's receipt, and if the inmate was advised in writing of the appeal disposition.

Results

Both grievances (100%) met the criteria for this objective.

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**SUMMARY OF AUDIT RESULTS**

The audit yielded the following results:

**Table No. 1 - Summary of Audit Results**

<b>Objective No.</b>	<b>AUDIT OBJECTIVES</b>	<b>Met the Criteria</b>
<b>1</b>	<b>PROPER IDENTIFICATION AND CLASSIFICATION OF INMATE GRIEVANCES</b>	
1(a)	<i>To determine if the inmate grievance was properly forwarded upon the line sergeant's initial review.</i>	<b>96%</b>
1(b)	<i>To determine if the inmate grievance was properly forwarded upon the grievance team's review after initial review by line sergeant.</i>	<b>91%</b>
1(c)	<i>To determine if the inmate grievance was properly categorized as emergent or non-emergent upon the watch commander's receipt.</i>	<b>100%</b>
<b>2</b>	<b>COMPLETENESS OF GRIEVANCE INVESTIGATION</b>	
2	<i>To determine if the grievance investigation was completed reasonably.</i>	<b>70%</b>
<b>3</b>	<b>TIMELINESS</b>	
3(a)	<i>To determine if the inmate was notified of an emergency grievance modification within five calendar days</i>	<b>83%</b>
3(b)	<i>To determine if non-emergency grievances were completed within established time frames.</i>	<b>46%</b>
<b>4</b>	<b>APPEALS PROCESS</b>	
4	<i>To determine if notification of disposition of a non-emergency grievance appeal was provided to the inmate within the established time frame of the Department's receipt of the appeal.</i>	<b>100%</b>

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**ADDITIONAL INFORMATION**

*Duplicate Grievances*

CRDF accepts duplicate grievances from inmates. Each grievance is entered into the CARTS system as a new grievance with a unique facility reference number.<sup>12</sup> In this entry, the new grievance is noted as a duplicate of a previously submitted grievance. CRDF staff then quickly closes the new duplicate grievance as complete and links to the original grievance within CARTS. Auditors note that these actions could be taken without generating a new facility number, which inflates the reported number of inmate grievances unnecessarily.

The seven grievances that were identified as duplicates were evaluated by auditors, but not included in the audit results. The categories for the duplicate grievances included complaints regarding shower access, religious services access, inmate on inmate conflict, an allegation of use of force, and a third party grievance from the American Civil Liberties Union (ACLU). All seven of the original grievances were investigated completely and well documented.

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<sup>12</sup> Facility Reference Numbers are issued through CARTS to each grievance to ensure tracking by the Inmate Grievance Team throughout the grievance process.

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#### *Electronic Grievance Form Submission*

Apple iPads have been installed in all custody facilities for the purposes of inmate information requests and grievances. The devices were initially able to electronically submit both requests and grievances. However, the devices have been disabled from submitting grievances, due to the volume received. CSS stated to auditors their intent to restore this function in the future.

### **CONCLUSION**

The evidence presented provides reasonable assurance the Department personnel are adhering to policies and procedures regarding the inmate grievance process with the exception of the timely submission of inmate grievance dispositions.

### **RECOMMENDATIONS**

When policies and procedures are not adhered to, it may result in increased risk to the Department. It would be beneficial for management to disseminate the results of this audit to its personnel. Additionally, as a best practice, management is encouraged to continue conducting recurrent and ongoing briefings of policies and procedures. The AAB considers the results of this audit to be a helpful management tool and therefore, makes the following recommendations:

1. CARTS personnel should track submissions after five days to ensure that all Inmate Grievances are assigned to an investigator. (Objective No. 1)
2. To ensure consistency among Inmate Grievance Investigations, it is recommended line sergeants and watch commanders receive training on CDM, Section 8-01/020.00, Responsibilities, CDM, Section 8-03/010.00, Emergency Grievances, CDM, Section 8-04/030.00, Appeals Process and Structure, CDM, Section 8-04/030.05, Appeals of Grievances Not Against Staff, CDM, Section 8-04/030.05, Appeals of Inmate Grievance handbook in this training. (Objective No. 2)
3. To assist with record keeping and avoid delays submitting completed Inmate Grievance Investigations, it is recommended that the Inmate Grievance Team implement a system to notify handling investigators when deadline dates are approaching. (Objective No. 3)
4. Auditors recommend that duplicate grievances be linked to the original grievance without creating an additional facility reference number. Assigning new facility reference numbers to duplicate inmate grievances inflates the grievance count at the facility. (Additional Information)

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**Views of Responsible Officials**

On February 19, 2020, the Custody Services Specialized Programs submitted a formal response to AAB concurring with the audit results.

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This audit was submitted on this 3 day of March, 2020, by the Audit and Accountability Bureau. A copy of the audit was provided to the Office of Inspector General.

*Original signature on file at AAB*

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DIANNA J. WOODWARD  
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