

# Los Angeles County Sheriff's Department

Audit and Accountability Bureau



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Mandatory Rotation of Line  
Personnel In Custody Audit  
Custody Services Division –  
Specialized Programs –  
Century Regional Detention  
Facility

Audit No. 2020-4-A

October 7, 2020

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

**MANDATORY ROTATION OF LINE PERSONNEL IN CUSTODY AUDIT**  
**CUSTODY SERVICES DIVISION – SPECIALIZED PROGRAMS**  
**CENTURY REGIONAL DETENTION FACILITY**  
**Project No. 2020-4-A**  
**AUDIT REPORT**

**PURPOSE**

The Audit and Accountability Bureau (AAB) conducted the Mandatory Rotation of Line Personnel in Custody Audit 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) and the Century Regional Detention Facility (CRDF) complied with policies and procedures pertaining to the mandatory rotation of line personnel. The audit also 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 (Rosas)*.<sup>1</sup>

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

**BACKGROUND**

On September 28, 2012, the CCJV report noted the lack of a rotation policy contributed to allegations regarding the use of force, resistance to supervision, and the development of a culture of silence within the Custody Division. The CCJV made various recommendations pertaining to operations within the Department's custody facilities. Among the various recommendations was the mandatory rotation of line personnel. Recommendation 6.8 stated:

***Rotations Within and Among Proximate Facilities Should be Implemented.***

***The Department should implement a sensible but steadfast policy that ensures rotation of deputies within Custody without vaguely defined exceptions...***

As a result of the CCJV recommendation, on April 18, 2013, the Department implemented Custody Division Manual (CDM) Section 3-01/020.05, Mandatory Rotation of Line Personnel in Custody.

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<sup>1</sup> On September 28, 2012, the CCJV report was published and the Department agreed to implement several recommendations. In addition, on September 26, 2014, the Department 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.

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The policy required unit commanders in custody facilities to ensure line personnel were rotated between job assignments at least once every six months.<sup>3</sup>

On October 1, 2015, the Department revised the CDM, Section 3-01/020.05, to clarify the rotation policy. The revision also addressed two provisions from the *Rosas Implementation Plan*:

### ***18. Adequate Staffing and Staff Rotations (expected to be completed by June 30, 2015):***

*18.1 The Department should maintain its Custody-wide rotation policies and rotate Department members at least as often as provided in those policies.*

*18.2 The Department should audit semi-annually each unit's compliance with its rotation policies.*

## **PRIOR AUDIT**

AAB has conducted ten prior mandatory rotation of line personnel audits at the Department's custody facilities. One of these prior mandatory rotation of line personnel audits was conducted at CRDF (Project No. 2014-5).

## **METHODOLOGY**

### **Scope**

This audit encompassed two main objectives to ensure compliance with the Department's policy related to CRDF personnel rotations. Both the CDM and CRDF Unit Orders were utilized in the analysis of this audit.

- Objective No. 1 – Six-Month Rotation of Line Personnel – To determine if line personnel are rotated between job assignments at least once every six months and did not return to their prior position for a period of no less than six months.
- Objective No. 2 – Rotation Compliance Records Maintained for Two Years – To determine if rotation compliance records are maintained for two years.

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<sup>3</sup> The CDM sets a minimum standard of performance for personnel assigned to the Custody Division. Individual units within Custody Division may establish their own procedures which address practices and standards within their own unit. However, unit practices and standards shall not be less restrictive nor shall they lower the standard of performance required by Division policy.

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**Audit Time Period**

The audit time period was from January 1, 2018, through December 31, 2019.

**Audit Population**

Auditors identified varying populations in order to examine the different aspects of the two main objectives, which are described in the Audit Objectives and Results Section of this report.

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**AUDIT OBJECTIVES AND RESULTS**

**Objective No. 1 – Six-Month Rotation of Line Personnel**

**Objective 1(a) – Determine if line personnel are rotated between job assignments at least once every six (6) months**

Criteria

Custody Division Manual, Section 3-01/020.05, Mandatory Rotation of Line Personnel in Custody, (October 2015), states:

*...All unit commanders shall ensure line personnel are rotated between job assignments at least once every six (6) months.*

*...Personnel shall work in a position which shall be different from their previously assigned position, for the majority of the rotation period.*

Century Regional Detention Facility Unit Order #3-05-025, Mandatory Rotation, (January 2019), states:

*All non-coveted, non-specialized positions in CRDF shall rotate every six (6) months...*

Citizens' Commission on Jail Violence, Recommendation 6.8, Rotations Within and Among Proximate Facilities, states:

*The Department should implement a sensible but steadfast policy that ensures rotation of deputies within Custody without vaguely defined exceptions. This rotation policy should include movement of deputies among proximate facilities as well as rotation among floors.*

Procedures

Auditors identified a total of 625 personnel listed in the Scheduling Management System (SMS)<sup>4</sup> who were assigned to CRDF during January 1, 2019, through December 31, 2019. The SMS database was utilized to confirm individual work assignments.

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<sup>4</sup> The SMS is a web application developed to publish daily In-Service rosters. It facilitates the creation and adjustments to personnel schedules, identifying and filling vacancies, rotating work schedules, and position assignments.

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Personnel assigned to non-coveted specialized positions identified in the CRDF Unit Order, Section 3-05-025, as exempt from the mandatory six-month rotation policy were excluded from this objective. As stated in CDM Section 3-01/020.05, non-coveted specialized positions include personnel assigned to inmate services, infirmary, laundry, kitchen, special projects, and vocational shops, etc. In order to determine whether an assignment rotation occurred, personnel who did not work at least seven months at CRDF, were also excluded. This resulted in a population of 132 personnel, of which auditors selected a sample of 56 line personnel who were subject to the mandatory rotation requirements.<sup>5</sup>

The sampled employees' assignments and rotations were identified by utilizing the employees' cycle schedules in SMS, which were then reconciled with the employees' monthly calendars of assignments in SMS. It was determined the employees' cycle schedules were the proposed assignments for the month, whereas the monthly calendars denoted the actual daily assignments worked. Auditors evaluated the information to determine whether the employee rotated between job assignments at least once every six months.

### Results

Fifty-three of the 56 (95%) sampled personnel met the criteria. Three personnel did not meet the criteria because they did not rotate between job assignments at least once every six months during the audit time period as summarized below in Table No. 1.

**Table No. 1 - Summary of Personnel Who Did Not Rotate**

CRDF Job Assignment Area	Duration in Assignment	Number of Personnel
Frank 7	7 months	1
25/26 Rover Deputy	9 months	1
2600 (UF)	8 months	1
<b>TOTAL</b>		<b>3</b>

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<sup>5</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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**Objective 1(b) – Determine if line personnel did not return to their prior position for a period of no less than six (6) months**

Criteria

Century Regional Detention Facility Unit Order #3-05-025, Mandatory Rotation, (January 2019), states:

*...Rotations shall occur on an on-going basis throughout the year and personnel shall not return to their prior position for a period of no less than six (6) months.*

Procedures

Auditors evaluated the sampled employees' assignments and rotations to determine whether the employees who rotated between job assignments did not return to their prior position for a period of no less than six months.

Results

Fifty-three of the 56 (95%) sampled personnel met the criteria. Three personnel did not meet the criteria because they returned to their prior position in less than six (6) months as summarized below in Table No. 2.

**Table No. 2 - Summary of Personnel Who Returned to Their Prior Position**

<b>CRDF Job Assignment Area</b>	<b>Number of Personnel</b>
3 West Safety Check	1
3300 Module Deputy	1
2600 (UF)	1
<b>TOTAL</b>	<b>3</b>

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### **Objective No. 2 – Rotation Compliance Records Maintained for Two Years**

#### Criteria

Custody Division Manual, Section 3-01/020.05, Mandatory Rotation of Line Personnel in Custody, (October 2015), states:

*Unit Commanders shall ensure that all rotation compliance records are maintained for two (2) years to show adherence to this policy.*

Century Regional Detention Facility Unit Order #3-05-025, Mandatory Rotation, (January 2019), states:

*CRDF Scheduling personnel shall ensure that all rotation compliance records are maintained for two (2) years to show adherence with this policy...*

#### Procedures

Auditors obtained copies of the official daily In-Service rosters<sup>6</sup> for the two-year period of January 1, 2018 through December 31, 2019, and examined these documents for the requirement of maintaining rotation records. Auditors also verified that copies of official daily In-Service rosters were physically archived.

#### Results

Auditors noted there were missing pages in the official signed copy of the daily In-Service rosters for various dates during the period of January 1, 2018 through December 31, 2019. Therefore CRDF did not meet the criteria for this objective.

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<sup>6</sup> The official daily In-Service roster is a form which documents the position worked by the employee for each shift, for any given date. It indicates personnel present or documents their absence.



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**SUMMARY OF RESULTS**

The audit yielded the following results:

**Table No. 3 - Summary of Audit Results**

<b>Objective No.</b>	<b>Audit Objectives</b>	<b>Met the Criteria</b>
<b>1</b>	<b>SIX-MONTH ROTATION OF LINE PERSONNEL</b>	
1(a)	<i>Determine if line personnel are rotated between job assignments at least once every six (6) months.</i>	<b>95%</b>
1(b)	<i>Determine if line personnel did not return to their prior position for a period of no less than six (6) months.</i>	<b>95%</b>
<b>2</b>	<b>ROTATION COMPLIANCE RECORDS MAINTAINED FOR TWO YEARS</b>	
	<i>Determine if rotation compliance records are maintained for two (2) years.</i>	<b>Did Not Meet the Criteria</b>

**OTHER RELATED MATTERS**

Other related matters are pertinent issues discovered during the audit, but were not objectives which were measurable against Department policies and procedures.

*Inaccuracies of In-Service Rosters and SMS Calendars*

During a review of the rotation compliance records, auditors noted inaccuracies between the daily In-Service rosters and the SMS calendars. Auditors found that of the 56 line personnel, 10 had work assignments on the SMS calendars that did not match the signed In-Service rosters.

**CONCLUSION**

Auditors performed analyses and made assessments to identify areas in need of improvement. The AAB considers the results of this audit to be a helpful management tool for all Department personnel. The evidence presented provides reasonable assurance that Department personnel are adhering to policies and procedures as well as Unit Orders regarding the rotation of line personnel at CRDF.

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**RECOMMENDATIONS**

When Departmental policies and procedures are not adhered to, it results in an increased risk to the Department. Department management should disseminate the results of this audit to its personnel. Additionally, as best practice, Department management is encouraged to conduct recurring and ongoing briefing of policies and procedures. The AAB considers the results of this audit to be a helpful management tool and therefore, makes the following recommendation:

1. It is recommended that CRDF ensure that the SMS calendars reflect the schedule changes of the employees to match the official daily In-Service rosters.  
(Other Related Matters)

**View of Responsible Officials**

On October 1, 2020, the CRDF submitted a formal response to the AAB concurring with the audit results.

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This audit was submitted on this 7th day of October 2020, by the Audit and Accountability Bureau.

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