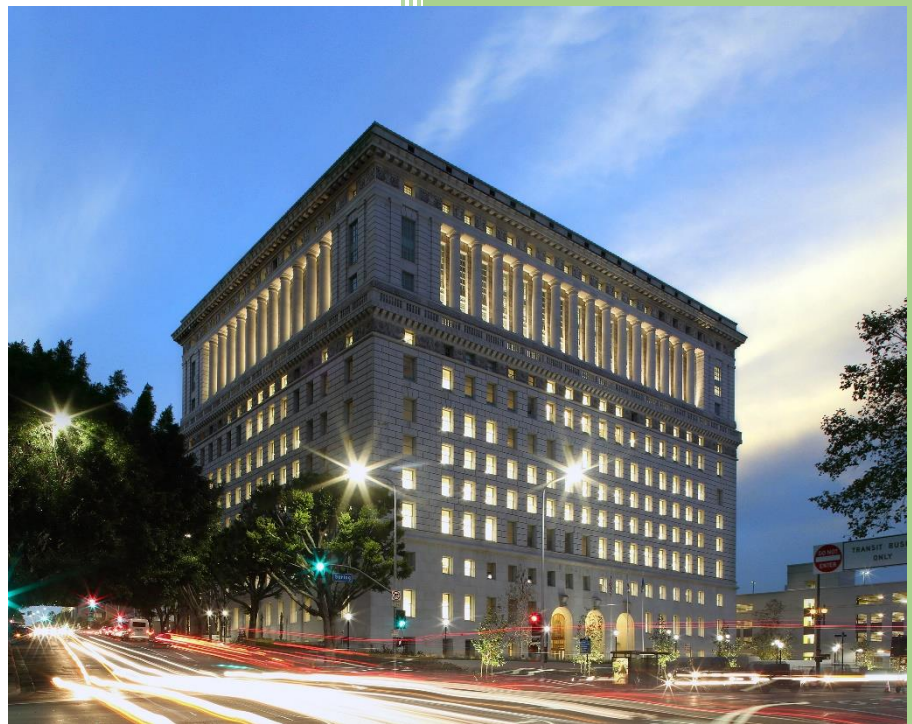


# Los Angeles County Sheriff's Department

Audit and Accountability Bureau



Alex Villanueva, Sheriff

**INMATE GRIEVANCES AUDIT**  
CUSTODY SERVICES DIVISION -  
SPECIALIZED PROGRAMS -  
TWIN TOWERS CORRECTIONAL  
FACILITY

Project No. 2020-7-A

January 12, 2021

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

**INMATE GRIEVANCES AUDIT**  
**CUSTODY SERVICES DIVISION - SPECIALIZED PROGRAMS**  
**TWIN TOWERS CORRECTIONAL FACILITY**  
**Project No. 2020-7-A**

**PURPOSE**

The Audit and Accountability Bureau (AAB) conducted the Inmate Grievances Audit – Twin Towers Correctional Facility (TTCF) 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), TTCF complied with the policies and procedures related to the processing, inquiry, and response to inmate grievances. This audit satisfied, in part, the recommendations of the Citizens' Commission on Jail Violence (CCJV) 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 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**

In 2012, the Los Angeles County Board of Supervisors, responded 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. The CCJV was convened 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 resulting in the creation of Volume 8 of the Department's Custody Division Manual (CDM).<sup>3</sup>

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<sup>1</sup> On September 26, 2014, the Sheriff of Los Angeles County 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.

## **PRIOR AUDITS**

This is the first Inmate Grievances Audit conducted at the TTCF.

## **METHODOLOGY**

### **Scope**

The scope of this audit is general inmate grievances.

This audit encompassed four main objectives for both emergency and non-emergency grievances:

- Objective No. 1 - Proper Categorization and Routing of Inmate Grievances - To determine if the grievance was properly classified and routed.
- Objective No. 2 - Completeness of the Inmate Grievance Inquiry - To determine if the nature of the inmate's complaint was documented and if the finding and relief of the grievance was based on the information presented.
- Objective No. 3 - Timeliness - To determine if grievances were resolved and responded to within the required time frame.
- Objective No. 4 - Appeals Process - To determine if notification of the disposition of a grievance appeal was provided to the inmate.

### **Audit Time Period**

The audit time period was October 1, 2019 through December 31, 2019.

### **Audit Population**

Auditors identified the population of general inmate grievances submitted at the TTCF from October 1, 2019 through December 31, 2019 via the Custody Automated Reporting and Tracking System (CARTS). Auditors selected a statistically valid random sample of 70 from the identified grievance population.<sup>4</sup> This sample was utilized to examine the different aspects of the four main objectives, which are described in the Audit Objectives and Results section of this report.

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

## **AUDIT OBJECTIVES AND RESULTS**

### **Objective No. 1 – Proper Categorization and Routing of Inmate Grievances**

#### **Objective 1(a) – To Determine if the Grievance was Properly Categorized as an Emergency or Non-Emergency, and Identified as Requiring Priority Handling**

##### **Criteria**

Custody Division Manual, Section 8-03/005.00, Inmate Grievances (September 2018), states:

*Any inmate under the Department's jurisdiction may grieve and appeal any decision, action, condition, or omission by the Department or its staff that the inmate can demonstrate as having a material adverse effect on his or her health, safety, or welfare...*

#### **PRIORITY GRIEVANCES**

*Personnel collecting, sorting, and processing completed Inmate Grievance Forms shall be careful to identify grievances requiring priority handling and to ensure they are handled according to protocols established in this policy. Examples of grievances which require priority handling include, but are not limited to:*

- *Emergency Grievances*
- *Healthcare Grievances*
- *Americans with Disabilities Act (ADA)-Related Grievances*
- *Grievances Against Staff*
- *Grievances of Retaliation*
- *Prison Rape Elimination Act (PREA)-Related Grievances*

#### **INMATE GRIEVANCE PROCEDURES**

*If during the processing or inquiry of an inmate's issue, it is determined the concerned inmate is only requesting information or a service, and is not grieving a decision, action, condition, or omission by the Department or its staff, the grievance shall be re-categorized and handled as a general request...*

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

*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...*

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*Additionally, in order to mitigate the possibility of an inmate being over-detained, any claim by an inmate wherein he or she alleges to have been held in custody beyond his or her release date shall be handled as an emergency grievance...*

*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...*

*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. 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...*

**Procedures**

Auditors evaluated CARTS to determine if the grievances in the selected population were properly categorized as an emergency or non-emergency, and if they were identified as requiring priority handling.

**Results**

Sixty-four of the 70 (91%) grievances met the criteria for this objective. Five of the grievances did not meet the criteria because they were requests for information, therefore, upon collection they should have been re-categorized as general requests. One grievance did not meet the criteria because it was not identified as a PREA-related grievance and therefore required priority handling.

**Objective 1(b) – To Determine if the Inmate Grievance was Properly Processed and Routed After the Initial Review**

Criteria

Custody Division Manual, Volume 8, Inmate Grievance Policy Handbook – Version 1.4, Custody Support Services (October 2016), states:

**PERSONNEL RESPONSIBILITIES**

*Priority requests and grievances (emergency grievances, and those against staff, alleging retaliation, or concerning PREA) shall be reviewed by the collecting line sergeant to determine whether the situation requires prompt action to protect the life or safety of the inmate, and, if so, the sergeant shall take any appropriate action. The sergeant shall promptly ensure that a reference number is issued to the priority request or grievance through CARTS, and shall promptly deliver the request or grievance to the watch commander. The sergeant shall further ensure that a copy of the priority request or grievance is placed in a secured collection bin, pending retrieval and tracking by Inmate Grievance Team personnel.*

*Watch commanders presented with any of the requests, grievances, or appeals requiring priority handling shall review them with priority, assign their handling to an appropriate supervisor, and ensure they are addressed in accordance with the procedures set forth in the Inmate Grievance Policy.*

*Inmate Grievance Team personnel shall collect requests, grievances, and appeals from the centralized collection bins. Each Inmate Grievance Team shall also be responsible for scanning and entering these into CARTS, assigning them reference numbers, and forwarding each request, grievance, or appeal to the appropriate person or unit for investigation and handling. In addition, Inmate Grievance Team personnel shall generate Acknowledgment of Grievance Notices and ensure their delivery to the facility's In-Custody Mail Handler for distribution to the concerned inmates.*

Procedures

Auditors evaluated CARTS to determine if the grievances in the selected population were properly routed after the initial review based upon the categorization of emergency or non-emergency, and/or required priority handling. Sixty-five of the 70 grievances were applicable to the criteria for this objective. Five grievances were not applicable because they were general requests and should have been re-categorized.

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Results

Sixty-four of the 65 (98%) grievances met the criteria for this objective. One grievance did meet the criteria because it was identified as a PREA-related grievance, which would have required priority handling. The grievance was not reviewed by a watch commander, and was not assigned to the appropriate supervisor for priority handling.

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**Objective No. 2 – Completeness of the Inmate Grievance Inquiry**

**Objective 2(a) – To Determine if the Nature of the Inmate’s Complaint was Documented**

Criteria

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

***UNIT INMATE GRIEVANCE COORDINATOR RESPONSIBILITIES***

*Unit Inmate Grievance Coordinators shall ensure all pertinent information regarding grievances is entered and tracked in CARTS and the entries reflect the nature and status of each grievance...*

Procedures

Auditors evaluated CARTS to determine if the nature of the inmate’s complaint was documented. Sixty-five of the 70 grievances were applicable to the criteria for this objective. Five grievances were not applicable because they were general requests and should have been re-categorized.

Results

All 65 (100%) grievances met the criteria for this objective.

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**Objective 2(b) – To Determine if the Disposition of the Grievance Documented a Finding and Relief**

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...*

*Dispositions for general grievances which are not against staff shall be determined based both on the findings and the relief to be provided, as follows:*

**FINDINGS**

- *Sustained – the reviewer has determined that the facts and circumstances obtained during the inquiry appear to support the claim in the grievance.*
- *Not sustained – the reviewer has determined that the allegations and circumstances set forth in the grievance could not be substantiated.*
- *Sustained in part – the reviewer has determined that the facts and circumstances obtained during the inquiry appear to support some but not all claims in the grievance.*
- *Inconclusive – the inquiry fails to resolve the grievance, and there is insufficient evidence to either affirm or refute the inmate's grievance.*
- *Released prior to inquiry – the inquiry cannot be initiated as the inmate has been released and reasonable efforts to contact the inmate have not been successful, which shall be documented in the Custody Automated Reporting and Tracking System (CARTS).*
- *Outside Custody Services Division – the grievance concerns a matter under the jurisdiction of a unit outside of the Custody Services Divisions.*
- *Not processed (inmate on restricted status) – grievance will not be processed, as the inmate has been approved for a restriction of filing privileges...*
- *Not processed (exceeds limit) – the grievance will not be processed, as it exceeds the established weekly/monthly filing limits.*

**RELIEF**

- *Granted – the reviewer is granting all requested relief, if applicable.*
- *Granted in part – the reviewer determined some of the requested relief should be granted or a comparable alternative be provided, if applicable.*
- *Denied – the reviewer will not grant any part of the requested relief.*
- *Relief unavailable – the reviewer determined no relief is available.*
- *Referred to contract vendor – the reviewer has referred the grievance to a contract vendor for relief.*
- *Referred to Department of Mental Health – the reviewer has referred the grievance to the Department of Mental Health.*

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- *Referred – Court Services – the reviewer has referred the grievance to any unit of the Court Services Division.*
- *Referred – Other station/agency/entity – the reviewer has referred the grievance to an outside station, agency, or entity.*
- *Not processed (inmate on restricted status) – the grievance will not be processed, as the inmate has been approved for a restriction of filing privileges...*
- *Not processed (exceeds limit) – the grievance will not be processed, as it exceeds the established weekly/monthly filing limits.*

Procedures

Auditors evaluated CARTS to determine if the disposition of the inquiry documented a finding and relief based on the inquiry information presented. Sixty-five of the 70 grievances were applicable to the criteria for this objective. Five grievances were not applicable because they were general requests and should have been re-categorized.

Results

All 65 (100%) grievances met the criteria for this objective.

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### Objective No. 3 – Timeliness

#### Objective No. 3(a) – To Determine if Non-Emergency Inmate Grievance Results were Responded to Within 15 Calendar Days or by the Extended Due Date

##### Criteria

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

*... a printed Notification of Disposition form and an advisory of the right to appeal, generated in CARTS, shall be delivered to the inmate for any approval or denial of a grievance within fifteen (15) calendar days from the date the grievance was received by the Sheriff's Department, absent exceptional circumstances. The Notification of Disposition form provided to the inmate shall include the disposition and the reason(s) for the decision when the relief to be provided is "Granted in Part," "Denied," or "Relief Unavailable."*

*Inmates shall sign the printed Notification of Disposition form to document receipt of the written response. However, if the grievance was previously addressed as the result of a court order or other governmental referral, it is not mandatory to summon the inmate for his or her signature. The signed Notification of Disposition form shall be placed into the Unit Inmate Grievance Coordinator's in-box for further processing. The Inmate Unit Grievance Coordinator shall ensure that the receipt of the written response is properly entered in CARTS.*

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.*

##### Procedures

Auditors evaluated CARTS to determine if the non-emergency grievances in the selected population were responded to within fifteen (15) calendar days from the Department's receipt of the grievance, or by the extended due date. Sixty-five of the 70 grievances were applicable to the criteria for this objective. Five grievances were not applicable because they were general requests and should have been re-categorized.

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Results

Sixty-three of the 65 (97%) grievances met the criteria for this objective. One grievance did not meet the criteria because the grievance response to the inmate was not within 15 calendar days of the collection of the grievance. The second grievance did not meet the criteria because the grievance response to the inmate was after the due date of the first-level extension.

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**Objective No. 3(b) – To Determine if Emergency Inmate Grievance Results were Responded to Within 5 Calendar Days**

Criteria

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

*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. The watch commander shall further ensure a written response is provided to the inmate within five (5) calendar days documenting what action was undertaken to address the situation which gave rise to the emergency.*

Procedures

Auditors evaluated CARTS to determine if the emergency grievances in the selected population were responded to within five (5) calendar days from the Department's receipt of the grievance. All of the 70 grievances were non-emergency grievances, therefore, they were not applicable to this objective.

Results

Since there were no Emergency Grievances selected for this sample population, there were no results.

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**Objective No. 3(c) – To Determine if the Inmate was Notified of a Grievance Modification Within Five (5) 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 evaluated CARTS to determine if inmates were provided with a Notice of Grievance Modification within five calendar days of the collection of the initial grievance, when the grievance was modified from an emergency to a non-emergency. Twenty-three of the 70 grievances were applicable to the criteria for this objective. Five grievances were not applicable because they were general requests and should have been re-categorized. Forty-two grievances were not applicable because they were not considered to be an emergency by the inmate.

Results

Fifteen of the 23 (65%) grievances met the criteria for this objective. Five of the grievances did not meet the criteria because the Notice of Grievance Modification was not provided to the inmate within five calendar days of the collection of the grievances. Three grievances did not meet the criteria because a Notice of Grievance Modification was not generated, and therefore, not provided to the inmate.

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**Objective No. 3(d) – To Determine if the Inmate was Provided a Grievance Extension Notification When a Grievance Inquiry was Extended**

Criteria

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

*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.*

Custody Division Manual, Volume 8, Inmate Grievance Policy Handbook – Version 1.4, Custody Support Services (October 2016) states:

*Upon the approval of each level of extension, a Grievance Extension Notification must be generated in CARTS and promptly provided to the inmate.*

Procedures

Auditors evaluated CARTS to determine if inmates were provided a Grievance Extension Notification when a grievance inquiry was extended. Eight of the 70 grievances were applicable to the criteria for this objective. Five grievances were not applicable because they were general requests and should have been re-categorized. Fifty-seven grievances were not applicable because the grievance inquiry was not extended.

Results

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

## Objective No. 4 – Appeals Process

### Objective No. 4(a) – To Determine if Notification of the Disposition of a Non-Emergency Grievance Appeal was Provided to the Inmate

#### Criteria

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

#### ***First Level Appeal Review***

*...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...*

#### ***Second Level Appeal Review***

*...The inmate shall be advised, in writing, whether the second appeal was upheld (granted) or denied, within fifteen (15) calendar days of the Department's receipt of the appeal...*

#### Procedures

Auditors evaluated CARTS to determine if the inmate was advised of the results, in writing, within 15 calendar days for first level and second level appeals. One of the 70 grievances was applicable to the criteria for this objective. Five grievances were not applicable because they were general requests and should have been re-categorized. Sixty-four grievances were not applicable because an appeal was not submitted by the inmate.

#### Results

One (100%) grievance met the criteria for this objective.



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**Objective No. 4(b) – To Determine if Notification of the Disposition of An  
Emergency Grievance Appeal was Provided to the Inmate**

Criteria

Custody Division Manual, Section 8-04/030.15, Appeals of Emergency Grievances (July 2016), states:

***First Level Emergency Appeal Review***

*...The unit commander shall make a determination of the resolution of an emergency appeal within five (5) calendar days of receipt...*

***Second Level Emergency Appeal Review***

*...The concerned area commander, or designee, shall make the final determination of the resolution of an emergency appeal within ten (10) calendar days of receipt...*

Procedures

Auditors evaluated CARTS to determine if the inmate was advised of the results, in writing, within 5 calendar days for first level appeals and 10 calendar days for second level appeals. All of the 70 grievances were non-emergency grievances, therefore, they were not applicable to this objective.

Results

Since there were no Emergency Grievances selected for this sample population, there were no results.

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**SUMMARY OF RESULTS**

The audit yielded the following results:

<b>Objective No.</b>	<b>Audit Objectives</b>	<b>Met the Criteria</b>
<b>1</b>	<b>PROPER CATEGORIZATION AND ROUTING OF INMATE GRIEVANCES</b>	
1(a)	<i>To determine if the grievance was properly categorized as an emergency or non-emergency, and identified as requiring priority handling.</i>	<b>91%</b>
1(b)	<i>To determine if the inmate grievance was properly processed and routed after the initial review.</i>	<b>98%</b>
<b>2</b>	<b>COMPLETENESS OF THE INMATE GRIEVANCE INQUIRY</b>	
2(a)	<i>To determine if the nature of the inmate's complaint was documented.</i>	<b>100%</b>
2(b)	<i>To determine if the disposition of the grievance documented a finding and relief.</i>	<b>100%</b>
<b>3</b>	<b>TIMELINESS</b>	
3(a)	<i>To determine if non-emergency inmate grievance results were responded to within 15 calendar days or by the extended due date.</i>	<b>97%</b>
3(b)	<i>To determine if emergency inmate grievance results were responded to within 5 calendar days.</i>	<b>N/A</b>
3(c)	<i>To determine if the inmate was notified of a grievance modification within five (5) calendar days.</i>	<b>65%</b>
3(d)	<i>To determine if the inmate was provided a grievance extension notification when a grievance inquiry was extended.</i>	<b>100%</b>
<b>4</b>	<b>APPEALS PROCESS</b>	
4(a)	<i>To determine if notification of the disposition of a non-emergency grievance appeal was provided to the inmate.</i>	<b>100%</b>
4(b)	<i>To determine if notification of the disposition of an emergency grievance appeal was provided to the inmate.</i>	<b>N/A</b>

**OTHER RELATED MATTERS**

Other related matters are pertinent issues discovered during the audit or requested by the auditee, but were not objectives which were measureable against Department policies and procedures.

- *CARTS Entry Should Reflect Accurate Information from the Inmate Grievance Form*

During the analysis for Objectives 1 through 4, auditors evaluated the grievances to determine if the information entered into CARTS accurately reflected the information on the Inmate Grievance Forms. Through these evaluations, the auditors determined that the overall information entered was reflective of the Inmate Grievance Form. Auditors noted three grievances that were not entered into CARTS as emergency grievances, as indicated on the Inmate Grievance Form, and one grievance that indicated "Living Conditions" as the grievance issue, however the grievance issue was regarding "Food Services."

- *Documentation of Comprehensive Findings*

The steps required to properly resolve a grievance are determined by the type of grievance. The Inmate Grievance Policy Handbook requires that once the details of the grievance have been gathered and the inquiry has been conducted, details of the inquiry should be recorded in the “Notes” field. Auditors reviewed CARTS to determine if the findings in the “Notes” concisely described the complaint, including the statement and evidence which support and/or refute the complaint. Auditors determined that information was not recorded in the “Notes” field for the grievances that were evaluated during this audit. This absence of information makes it difficult to determine the steps taken during the inquiry, and what evidence was acquired to support and/or refute the complaint.

## **CONCLUSION**

Auditors performed analyses and made assessments to identify areas in need of improvement. The evidence presented provides reasonable assurance that Department personnel are not adhering to policies and procedures regarding the inmate grievance process at the TTCF.

## **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 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. To avoid delays in responses and notifications to inmates, it is recommended that TTCF staff implement a system to notify personnel handling grievance inquires of approaching deadline dates. (Objective No. 3)
2. To ensure consistency, it is recommended that an additional review of the information entered into CARTS is performed so that it accurately reflects the information documented on the Inmate Grievance Form. (Other Related Matters)
3. To provide documentation of thorough and complete inquires, it is recommended that reviewing supervisors require that personnel handling grievance inquires, document the steps taken and the evidence gathered during the inquiry within the “Notes” field in CARTS. (Other Related Matters)

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**Views of Responsible Officials**

On December 28, 2020, Custody Services Division command staff submitted a formal response to the AAB concurring with the audit results.

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This audit was submitted on this 12<sup>th</sup> day of January 2021, by the Audit and Accountability Bureau. A copy of the audit report was provided to the Office of the Inspector General.

*Original signature on file at AAB*

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