

Santa Clara County  
**OFFICE OF CORRECTION AND LAW  
ENFORCEMENT MONITORING**

Report on Audit of Jail Reform  
Recommendations

Interim Report #6  
April 16, 2024

OIR GROUP

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# Introduction and Background

The 623 recommendations that emerged from the reports of 15 separate entities as part of the County's effort to reform its jails beginning in 2016 have led to a number of important initiatives and improvements, as personnel from both the Sheriff's Office and Custody Health Services have worked over the years to address those recommendations. That work has been done in tandem with efforts to comply with the provisions of the federal consent decrees in the *Chavez* and *Cole* cases.

At the Board's direction, OCLEM has served since December 2020 as the auditor of the departments' progress on implementing these jail reforms recommendations. This is our sixth report on those efforts.

Prior to 2020, the Finance and Government Operations Committee (pursuant to reports from the Office of the County Executive) grouped the 623 recommendations into 80 Summarized Recommendations. Up until now, our auditing efforts have been organized around these Summarized Recommendations, though the direction from the Board was to audit and confirm completion of each Master List Recommendation. As a result, our ability to recognize the work completed on many items has been slowed, as a Summarized Recommendation could only be deemed completed when all its subparts were completed. As a result, for example, if a Summarized Recommendation encompassed 10 Master List Recommendations, and nine out of 10 were complete, OCLEM would not receive materials to audit those nine recommendations until completion of the tenth.

With the concurrence of County Administration, OCLEM decided to consider individual Master List Recommendations outside of the Summarized Recommendation structure, to enable us to consider and evaluate the work that had been done toward completing these recommendations, even if the entire Summarized Recommendation has not been implemented. As a result, we are able to report here on many more recommendations than in prior reports.<sup>1</sup>

Our previous five reports addressed a total of 20 Summarized Recommendations and 173 Master List Recommendations. In this report, we identify and address 125

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<sup>1</sup> For clarity, we maintained reference to the Summarized Recommendation in which the Master List Recommendation originally had been grouped.

recommendations that have either been completed, have had their objectives met through other means, or should not be implemented because OCLEM agrees with the Sheriff’s Office or Custody Health’s assessment regarding feasibility or other concerns. Other recommendations identified in this report should be removed from the list of those to be audited because they are outdated, vague, no longer applicable, contrary to law, or contradict other recommendations. In all, we identify 150 recommendations for which the auditing by OCLEM should be deemed completed for one reason or another. As shown in the table below, combined with our prior five reports, we have completed our audit of a total of 322 of the 623 Master List Recommendations.

Our work for this report involved the review of hundreds of pages of documents, regular meetings with County and Sheriff’s Office staff, a full day of in-person meetings at the Sheriff’s Office to learn about various programs and initiatives and to ask follow-up questions, and countless emails back-and-forth with Sheriff’s Office personnel to gather additional information and clarify responses.

We only report here on recommendations that we find should be considered fully audited for the reasons we provide. We reviewed many others where we had further questions about work done towards implementation, or where we found additional work needs to be done. We will continue to work with the Sheriff’s Office and Custody Health on these recommendations, and on others we have not yet fully reviewed. We will continue to report on this work as it progresses.

**Jail Reform Recommendations:  
Auditing Deemed Complete by OCLEM**

OCLEM Report	Summarized Recommendations	Master List Recommendations
1 – Sept 2021	8	34
2 – April 2022	2	15
3 – June 2022	3	28
4 – Jan 2023	4	16
5 – Oct 2023	3	79
6 – April 2024	n/a	150
Total	20	322

We appreciate the assistance and cooperation of the Office of the County Executive in coordinating and facilitating the production of documents and other responses to our audit requests. We are also grateful for the ability to collaborate with the Sheriff's Office Custody Bureau, Custody Health Services, and County Counsel personnel in structuring our audit work, and for their efforts to provide the documentation and access necessary to complete this review. All were given a draft version of this report and opportunity to provide feedback or further clarification. We look forward to our ongoing work and collaboration to complete this auditing project.

# Audit Findings: Completed Recommendations

The following recommendations have either been completed, have had their objectives met through other means, or should not be implemented because OCLEM agrees with the Sheriff’s Office or Custody Health’s assessment regarding feasibility or other concerns (as detailed below). Each of the audited recommendations is listed below by its Master List number, but organized into groupings according to Summarized Recommendation number. OCLEM’s findings regarding each recommendation follows.

Recommendation		OCLEM Finding
Summarized: HLC 1		
611	The County should investigate the possibility of deploying a KOP medication process within the Santa Clara County Jail System and possible nursing staff savings associated with this process.	Objective met
619	Dr. Gage recommended that the County carefully review its options for involuntary medications under both emergent and non-emergent situations, which should include the jails as well as those committed under LPS.	Completed
624	Dr. Gage recommended adequate monitoring of prescribed antipsychotics. He stated that drug levels and laboratories for mood stabilizers, baseline studies before initiating treatment, and electrocardiograms for certain medications need to be done routinely.	Completed

*611: The County should investigate the possibility of deploying a KOP medication process within the Santa Clara County Jail System and possible nursing staff savings associated with this process.*

Developing a “keep on person”<sup>2</sup> program for some medications is a provision in the Chavez Remedial Plan. While the program has not yet been fully implemented (the monitors have found the County to be in partial compliance), CHS has initiated a limited program, with plans to expand it in the coming months. As such, the program has been sufficiently developed to consider the goal of this recommendation (“investigate the

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<sup>2</sup> This refers to a practice of allowing individuals to keep a certain quantity of prescribed medication with them to take as needed or directed, as opposed to having each dose administered by medical staff.

*possibility . . .”)* to have been met, particularly because we recognize the ongoing role of the federal monitors in ensuring the program is fully implemented.

*619: Dr. Gage recommended that the County carefully review its options for involuntary medications under both emergent and non-emergent situations, which should include the jails as well as those committed under LPS.*

The Mental Health monitoring team of the *Chavez* Remedial Plan reviews patient treatment plans in detail for compliance with various benchmarks, including all medications. In addition, OCLEM’s recent review of incidents involving planned uses of force to administer involuntary medications (as described in our August 29, 2023 report on Planned Uses of Force and in our presentation to CCLEM on September 7, 2023) confirmed that ACHS carefully reviews options for involuntary medications, and there is a detailed level of review and due process provided in these situations. Accordingly, we find this recommendation to be completed, subject to ongoing monitoring.

*624: Dr. Gage recommended adequate monitoring of prescribed antipsychotics. He stated that drug levels and laboratories for mood stabilizers, baseline studies before initiating treatment, and electrocardiograms for certain medications need to be done routinely.*

The *Chavez* consent decree Remedial Plan contains a provision requiring: *ACHS staff shall routinely order appropriate lab tests to monitor inmates who have been prescribed psychotropic medications, including monitoring drug levels.*

In its December 2022 report, the monitoring team<sup>3</sup> found substantial compliance with this recommendation after reviewing over 200 patient charts. The chart review found that medical practitioners follow relevant practice guidelines and consistently order and review appropriate lab studies. We find this recommendation to be completed, and subject to ongoing monitoring by the federal monitors.

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<sup>3</sup> Pursuant to a federal court order, the monitors are selected by the parties and approved by the federal court. The monitors are experts in their respective fields (psychiatry, psychology, medicine, dentistry, nursing, for example) and as part of their monitoring work under the consent decrees, they have broad access to individuals, staff, and records, and regularly perform onsite tours of the jail facilities.

OCLEM has access to the monitors’ reports and other confidential materials consistent with the County Ordinance Code and information-sharing protocols. Where we rely on findings made by the monitoring teams to conclude in this report that a particular recommendation has been completed, it is after our review of the monitors’ reports and with an understanding of the basis for their findings.

Recommendation		OCLEM Finding
Summarized: HLC 8		
54	Apply the same rigorous analysis and establishment of performance measures for Custody Health Services that is comparable to audits and evaluations of other departments and programs.	Completed
111	Need a records and information system that ties custody health to County Mental Health and Community Mental health to allow for linkages and connections when mentally ill offenders are released. The system must allow input from all health programs involved in providing care to the individual.	Completed
391	Add minimum performance standards for Custody Health clinical positions.	Custody Health disagrees. OCLEM concurs.
392	Accelerated the implementation of cutting edge electronic medical record technology.	Completed
571	The County should choose one medical information system and insist that all information about health care reside in that singular system.	Completed
572	The EPIC target system implementation should be expedited as much as possible.	Completed
617	Dr. Gage recommends that DOC follow through with the plan to get expert consultation regarding the classification system.	Completed
622	Dr. Gage found that there was no unitary medical record system. The records were accordingly fragmented. Dr. Gage recommended that the medical records system be completely revamped and noted that there are plans to do so.	Completed
631	Dr. Gage recommended that confidentiality be provided in all settings to the maximum degree possible. All written documents, including personal health information should be processed by health care staff, including administrative staff (sealed or otherwise protected materials can be handled by any staff, e.g., for the purposes of transport) or custody staff who are bound by the same confidentiality strictures.	Completed
635	Dr. Gage recommended the dedication of more resources to QA/QI, including staff resources, IT support, and analytic support. He further recommended that the QA/QI programs include formal provisions for clinical supervision and/or peer review.	Completed
636	Dr. Gage also recommended a more robust review of sentinel events, including near miss events, serious self-harm, assaults involving injury in mental health Special Management Units and LPS-certified units, injuries during episodes of restraint, and emergent use of force involving the mentally ill (controlled use of force should be reviewed through standard processes for use of force review).	Completed



*54: Apply the same rigorous analysis and establishment of performance measures for Custody Health Services that is comparable to audits and evaluations of other departments and programs.*

Custody Health Services Policy 13.6 establishes a Quality Management Program for Custody Health Services that focuses on evaluation of patient care according to state/local laws and regulations, accreditation standards, evidence-based practice, cost-effectiveness and community standards through establishment and maintenance of effective quality assurance, risk management and quality improvement strategies. The policy also defines a Quality Assurance process that verifies whether health care services meet or exceed laws, regulations, and standards. The effectiveness of this program is regularly reviewed in different contexts by monitors of the *Chavez* remedial plan with respect to how it impacts specific individual provisions of the remedial plan.

*111: Need a records and information system that ties custody health to County Mental Health and Community Mental health to allow for linkages and connections when mentally ill offenders are released. The system must allow input from all health programs involved in providing care to the individual.*

*392: Accelerated the implementation of cutting edge electronic medical record technology.*

*571: The County should choose one medical information system and insist that all information about health care reside in that singular system.*

*572: The EPIC target system implementation should be expedited as much as possible.*

*622: Dr. Gage found that there was no unitary medical record system. The records were accordingly fragmented. Dr. Gage recommended that the medical records system be completely revamped, and noted that there are plans to do so.*

*631: Dr. Gage recommended that confidentiality be provided in all settings to the maximum degree possible. All written documents, including personal health information should be processed by health care staff, including administrative staff (sealed or otherwise protected materials can be handled by any staff, e.g., for the purposes of transport) or custody staff who are bound by the same confidentiality strictures.*

These recommendations were addressed by the County's introduction of HealthLink in May 2017. HealthLink is the electronic health record system utilized by Custody Health Services and the Santa Clara Valley Healthcare system. HealthLink is comprehensive record system used for capturing and documenting the medical and mental health care

provided to patients including labs, medications, clinical notes, charts, patient history, and other information. Access to HealthLink is strictly limited and tracked to ensure patient confidentiality.

*391: Add minimum performance standards for Custody Health clinical positions.*

Custody Health Services disagrees with this recommendation as unnecessary, as all clinical positions carry their own professional licensing requirements, which provide sufficient and appropriate guidelines for minimum performance standards. Because the professional licensing requirements provide, by necessity, standards for clinicians, OCLEM agrees with this position and believes this recommendation should be removed from the list of those being audited.

*617: Dr. Gage recommends that DOC follow through with the plan to get expert consultation regarding the classification system.*

In 2017, Custody Bureau adopted a new system for classifying inmates based on the objective classification tool recommended by James Austin, an expert the County engaged in 2016 to assess the jail's prior classification system. Accordingly, this recommendation has been achieved.

*635: Dr. Gage recommended the dedication of more resources to QA/QI, including staff resources, IT support, and analytic support. He further recommended that the QA/QI programs include formal provision for clinical supervision and/or peer review.*

The development of a robust Quality Assurance/Quality Improvement (QA/QI) program has been a significant emphasis of the *Chavez* remedial plan, with various aspects being monitored by both the Medical-Dental and Mental Health Monitoring teams. Clinical supervision and peer review processes are in place for both medical and mental health care, as established by policy and regularly reviewed by the monitoring teams. The monitors have found the County in substantial compliance with the QA/QI provisions of the remedial plan.

*636: Dr. Gage also recommended a more robust review of sentinel events, including near miss events, serious self-harm, assaults involving injury in mental health Special Management Units and LPS-certified units, injuries during episodes of restraint, and emergent use of force involving the mentally ill (controlled use of force should be reviewed through standard processes for use of force review).*

This recommendation closely tracks a provision of the *Chavez* remedial plan. The County has policy on reviewing sentinel/significant events that meets these requirements.

In addition, the monitors review Quality Improvement case studies and documentation and have found them to be compliant, comprehensive, and exceeding industry standards. Regarding the use of force, Custody convenes regular meetings of its Use of Force Review Committee (UFRC). OCLEM attends and has the opportunity to ask questions and weigh in on these meetings. Further, all records from the UFRC are provided to the federal monitors.

Recommendation		OCLEM Finding
Summarized: JAF 1		
423	Expand the number of medical beds at Elmwood Correctional Facility.	Completed
424	Begin the necessary repairs and physical improvements to Elmwood's M1 building that will result in the addition of 80 more medical beds. Funding has been allocated and construction has commenced.	Completed
582	The intake facility should investigate whether additional consent is necessary from prisoners in order to obtain their health care records in a way that is compliant with HIPAA standards.	Completed

*423: Expand the number of medical beds at Elmwood Correctional Facility.*

The Sheriff's Office increased the number of medical beds at the Elmwood Correctional Facility through the medical clinic in building M1.

*424: Begin the necessary repairs and physical improvements to Elmwood's M1 building that will result in the addition of 80 more medical beds. Funding has been allocated and construction has commenced.*

This construction has been completed.

*582: The intake facility should investigate whether additional consent is necessary from prisoners in order to obtain their health care records in a way that is compliant with HIPAA standards.*

Custody Health Services created a new Release of Information form that addresses these consent and privacy concerns.

Recommendation		OCLEM Finding
Summarized: JAF 5		
152	Improve sanitation and health for detainees and staff by: 1. Provide more frequent complete changes of clothing, extra towels and linens. 2. Provide easy access to cleaning supplies. 3. Provide easy access to hygiene items such as soap, deodorant, shampoo, and feminine hygiene needs.	Completed
153	Inmate barber equipment and hair – cutting services: my recommendation is each module should have their own barber kit and hair-cutting services should be available when inmates are out for dayroom time or at least once per week, not once per month.	Objective met, with the exception of some high observation units, where the Sheriff's Office asserts weekly haircuts are impractical and disagrees with the recommendation. OCLEM agrees with the Sheriff's Office position.
154	Razors: I recommend the department purchase enough electric razors for inmate who are housed in a special management dorm.	Not completed, because the Sheriff's Office disagrees with this recommendation. OCLEM concurs with the Sheriff's Office position.
159	Provide a quiet staff break room. Corrections work is one of the most stressful in law enforcement. Staff needs a place to go to escape the hustle and bustle of the workplace. The ambiance of the break room can impact morale and motivation. Department should provide a clean, quiet break room for officers to unwind and rejuvenate to help them reduce stress in order to be an effective officer, especially if they are working in a high stressful area such as acute psych area (8A), intake booking, medical infirmary, etc.	Objective met
177	Explore the feasibility of staffing the women's section as an autonomous facility.	Completed, as the Sheriff's Office has explored the feasibility (though concluded it was not feasible)

Recommendation		OCLEM Finding
337	Direct FAF to immediately resolve poor plumbing, water temperature, heating, lighting, and access to water for showers and consumption. Inmates should not have to wait for a new building to be constructed to resolve this human rights concern.	Objective met, to the extent feasible
338	Ensure that inmates are allocated sufficient and effective cleaning supplies to maintain the hygiene and safety of their cells and dorms.	Completed
425	Establish dedicated FAF maintenance and repair crews to work directly with custody personnel. This will allow FAF to quickly identify, prioritize and complete maintenance, repair, and improvement projects of custody facilities.	Completed
427	Expand structured and unstructured “out time” for inmates by making improvements to housing units that have been closed due to age or physical conditions.	Completed

*152: Improve sanitation and health for detainees and staff by: 1. Provide more frequent complete changes of clothing, extra towels and linens. 2. Provide easy access to cleaning supplies. 3. Provide easy access to hygiene items such as soap, deodorant, shampoo, and feminine hygiene needs.*

Subsequent to this recommendation, individuals in custody are provided with additional clothing, including enough socks and underwear for a daily changing. Also, cleaning supplies, soap, deodorant, and feminine hygiene products are out and available for individuals to take as needed.

Questions about clothing and cleaning supplies have come up at the Inmate Advisory Council (IAC) meetings we’ve attended in the past year. So, while individuals may have access to more items than they did in 2016, concerns about the adequacy of these numbers remain. We found during our attendance at these meetings, though, that Sheriff’s Office personnel were responsive to individual’s requests. As with many of these recommendations, the subject of this recommendation will continue to be monitored by OCLEM as part of our regular attendance at IAC meetings.

*153: Inmate barber equipment and hair – cutting services: my recommendation is each module should have their own barber kit and hair-cutting services should be available when inmates are out for dayroom time or at least once per week, not once per month.*

The Sheriff’s Office does not fully agree with this recommendation. Grooming kits are available to all housing units, per the recommendation. But because these items present a

security risk, they must always be accounted for and cannot be freely available for use without supervision. Deputies provide the barber equipment upon request during dayroom time. OCLEM finds this is a reasonable security measure.

Custody personnel believe this recommendation stems from a former practice at Main Jail South, which had monthly schedule for haircutting services. Although Policy #16.05, Section IV.A continues to refer to hair-cutting services “at least once a month,” the practice in most units allows for grooming kits to be available upon request when individuals are in the dayroom. Custody is resistant to changing the policy to allow for weekly haircuts, because in some units – particularly the high observation mental health units – it takes active coordination of staff to monitor individuals with scissors and razors, and doing this on a weekly basis would have an outsized impact on other important functions. We find this to be a fair and credible position. During the Inmate Advisory Council (IAC) meetings we have attended, individuals have not raised the accessibility of grooming kits as an issue of concern, but we will continue to pay attention to this during future IAC sessions.

*154: Razors: I recommend the department purchase enough electric razors for inmate who are housed in a special management dorm.*

The Sheriff’s Office disagrees with this recommendation because electric razors are difficult to keep sanitized. And, while electric razors are safer than regular razors with removable blades, they still pose a security concern for those in Special Management Units. OCLEM finds the Sheriff’s Office position to be reasonable.

*159: Provide a quiet staff break room. Corrections work is one of the most stressful in law enforcement. Staff needs a place to go to escape the hustle and bustle of the workplace. The ambiance of the break room can impact morale and motivation. Department should provide a clean, quiet break room for officers to unwind and rejuvenate to help them reduce stress in order to be an effective officer, especially if they are working in a high stressful area such as acute psych area (8A), intake booking, medical infirmary, etc.*

Each facility currently has a breakroom available for staff to use to unwind from the daily stressors of the environment. The Sheriff’s Office values the health and wellness of its employees and would like to improve these spaces to create a more supportive atmosphere that is more attuned to the modern workplace. These improvements would be of value to the agency, but likely would require some creative funding initiatives.

Despite the desire for upgrades to the current breakrooms, the existing breakrooms satisfy the objective of this recommendation.

*177: Explore the feasibility of staffing the women's section as an autonomous facility.*

The Custody Bureau has explored the feasibility of this proposal, but given the current staffing shortage, it is not possible to create a fully autonomous staff in the women's facility. Custody does attempt to retain staff in the women's facility for as long as possible to create the type of continuity that is the aim of this recommendation.

*337: Direct FAF to immediately resolve poor plumbing, water temperature, heating, lighting, and access to water for showers and consumption. Inmates should not have to wait for a new building to be constructed to resolve this human rights concern.*

Fleet and Facilities (FAF) works to resolve issues with plumbing, lighting, heating, and access to clean water as they arise, though the demand for "immediate" resolution is likely not feasible. The Sheriff's Office reports that FAF is now more responsive than it was at the time these recommendations were written. FAF staff (HVAC/R mechanics, gardeners, electricians, plumbers, janitors, general maintenance mechanics) are now on site and are assigned to Custody, so there is a more direct connection that has led to greater collaboration. Custody reports that projects that have a potential health impact are prioritized for completion.

However, we regularly hear complaints about the condition of facilities, including plumbing and lighting issues that reportedly have not been timely addressed. We understand there are no simple solutions to these ongoing problems. As with the subjects of many of these recommendations, we will continue to monitor these important issues.

*338: Ensure that inmates are allocated sufficient and effective cleaning supplies to maintain the hygiene and safety of their cells and dorms.*

The Sheriff's Office reports that sufficient and effective cleaning supplies are available daily in each unit for individuals to clean their cells and dorms.

As we noted above, the availability of cleaning supplies has come up and been addressed at IAC meetings. We found the Sheriff's Office responsiveness to individuals' concerns sufficient to conclude this recommendation is completed, but we will continue to monitor the issue through our regular attendance at IAC meetings.



*425: Establish dedicated FAF maintenance and repair crews to work directly with custody personnel. This will allow FAF to quickly identify, prioritize and complete maintenance, repair, and improvement projects of custody facilities.*

As noted above, this has been completed. FAF now has crews assigned directly to Custody.

*427: Expand structured and unstructured “out time” for inmates by making improvements to housing units that have been closed due to age or physical conditions.*

Custody Bureau has made significant improvements to the allocation of recreational time, though that is related more to improved monitoring and the introduction of tablets, and less about physical improvements to housing units. Since the time of this recommendation, Main Jail South has been demolished. At Elmwood, the antiquated W1 Unit is no longer in use, while other dorms are undergoing construction for various upgrades/projects. Despite the need for ongoing work to improve facilities, individuals in custody now have expanded access to educational and recreational opportunities via the tablets, which were unavailable at the time this recommendation was written.

The ability to track and record individuals’ out-of-cell time will be greatly improved when the electronic tracking system is installed. That is anticipated to finally begin in September 2024. As we reported in September 2022, this system will utilize chips embedded in wristbands worn by those in custody that will be scanned to record individuals’ attendance at various programs and out-of-cell locations. As directed by this Board, OCLEM will provide a progress report on the tracking system six months after its implementation.

Recommendation		OCLEM Finding
Summarized: PGM 4		
93	Fund salaries and benefits of peer advocates, mentors, and others who work in the jails who directly support inmates in receiving services.	Not able to be implemented as written. However, the Reentry Center does employ peer advocates and mentors.



Recommendation		OCLEM Finding
119	Establish a plan to increase jail program offerings, with an emphasis on increasing opportunities geared toward successful re-entry and behavioral health recovery, and opportunities for inmates with higher level classifications. In addition, focus on bringing civilian and community-based services into the jail.	Objective met
120	Perform full scale assessment and plan for needs of long-term inmates that ensures breadth and infrastructure for services, including programming, medical care, and behavioral health care that is geared toward long term incarceration.	Objective met
121	Expand and offer evidenced based programming opportunities to all detainees interested in participating, regardless of classification or housing assignment. Program options to consider can include but not be limited to life skills, parenting, meditation, recovery, basic literacy skills, GED, college programs, enrichment opportunities, religious study, job preparation, ESL instruction, AA/NA, mental health and wellness and self-improvement. Detainees housed in areas where group instruction is difficult should be offered options via remote teaching on TV's or tablets. Establish a timeline for implementation.	Completed
122	Increase outreach to the community with volunteer opportunities to provide enrichment programs within all areas of the facilities. Provide expansion through existing systems such as the Chaplains office and other community based or advocacy agencies. Streamline the process for vetting, training and providing clearance for volunteers and advocacy groups to offer programs and services.	Completed
126	Utilize tablets or other available technology for educational materials for programs, so that all inmates who are eligible and who would like to participate, may participate in these programs.	Completed
127	Ensure that inmates who want to participate in programs and are eligible, have the opportunity to participate in programs.	Completed
180	Gender-responsive, trauma-informed, recovery-oriented, culturally appropriate programming and services for inmates.	Objective met
339	Establish and develop inmate programming for both pretrial detainees and inmates convicted and serving sentences.	Completed
433	Increase the overall participation in educational, comprehensive programs by expanding programs.	Completed
434	Improve the quality and increase the number of classes offered within the comprehensive programs and to increase services offered to inmates.	Completed
439	Working with a community organization to implement additional Alcoholics Anonymous and Narcotics Anonymous meetings in the jail.	Completed

This set of recommendations relate to programming opportunities for incarcerated individuals. We looked at these recommendations by considering the expressed goals. As we stated with respect to Summarized Recommendation PGM 2 in our fourth Interim Report (January 2023), many of these were anchored in a time when the Sheriff’s Office was doing very little programming within the jails, so the current status is an improvement, though still a work in progress.

The objective of many of these recommendations is to provide programming opportunities to all inmates in all facilities, regardless of security classification level. The Sheriff’s Office acknowledges the relatively limited opportunities available for inmates in Main Jail (compared to classes and programs offered at Elmwood). Personnel attribute that to several factors: the higher security level of those individuals, which requires additional staffing to move them out of their housing areas into different, less secure environments; current staffing shortages; and challenges due to the layout and available space in the current facility.<sup>4</sup>

Nonetheless, we believe the County has made sufficient progress to consider these specific recommendations to be implemented. But we note that providing quality programming opportunities to those in custody is an ongoing challenge. OCLEM, along with the Community Correction and Law Enforcement Monitoring Committee (CCLEM), will continue to play a role in the monitoring of the Sheriff’s Office’s efforts and will encourage the Sheriff’s Office to continually seek new and expanded opportunities for programming for those in custody.

*93: Fund salaries and benefits of peer advocates, mentors, and others who work in the jails who directly support inmates in receiving services.*

The Reentry Resource Center employs peer advocates and mentors to further its mission of reducing recidivism through its support of formerly incarcerated individuals. Peer mentoring is one of the many services offered to those leaving custody.

However, the Sheriff’s Office reports that due to security requirements prohibiting those with criminal backgrounds from entering the jail facilities, there have never been peer

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<sup>4</sup> Indeed, The Moss Group – engaged by the County to assess gender-responsiveness in the jails – identified the lack of programmatic space as one of its key findings: “*one of the key findings throughout this assessment that affect operations at CCW and across departments is the lack of programmatic space. Prioritizing a solution to this challenge would quickly improve a variety of factors from programming, clinical support, and community partnerships.*”

advocates and mentors who work in the jails, so the recommendation to fund their salaries and benefits is not one that can be implemented. We agree the recommendation is not able to be implemented as written.

*119: Establish a plan to increase jail program offerings, with an emphasis on increasing opportunities geared toward successful re-entry and behavioral health recovery, and opportunities for inmates with higher level classifications. In addition, focus on bringing civilian and community-based services into the jail.*

The position of Inmate Rehabilitation Manager (now titled Restorative Services Director) was designed to “work closely with law enforcement agencies, courts, Veteran’s Services, advocacy groups, community agencies, shelters, faith-based agencies and educational and vocational service organizations to develop, provide and evaluate programs and services to in-custody and out-of-custody inmates.” Through this position, Custody created the Community College Collaborative, which currently involves five community colleges, providing access to 63 unique courses to incarcerated individuals via remote and in-person learning. The collaborative has two established vocational program pathways – Kitchen and Culinary, offered by Mission College, and Multimedia (digital design, web design, video editing/production), offered by Ohlone College. Future college vocational pathways are planned with San Jose City College, Foothill-DeAnza College, and Evergreen College, in landscaping, welding, HVAC, auto tech, electrical, and veterinary assistant. Individuals who start these programs while in custody will be able to enroll in the community college and continue their education upon release.

One aspect of this recommendation – opportunities for inmates with higher level classifications – is a more difficult task to complete. Because of housing configurations (limited programming space at Main Jail), staffing concerns that accompany the demands of moving Main Jail inmates from their housing locations, and security risks (concern about giving high security individuals access to welding equipment, for example), those with higher level classifications housed at Main Jail do not have access to the same programs as those at Elmwood. While more limited, there are some programs offered to those with higher level classifications – the Five Keys program that helps individuals attain a high school diploma, a Roadmap to Recovery journaling program offered by Rehabilitation Officers, and various virtual programs on self-esteem, co-dependency, trauma recovery, anger management, relapse prevention and substance abuse, leadership, and meditation.

With the understanding that the task of providing high-quality programs, particularly to those in higher security housing, is an ongoing challenge, we find this recommendation has been implemented.

*120: Perform full scale assessment and plan for needs of long-term inmates that ensures breadth and infrastructure for services, including programming, medical care, and behavioral health care that is geared toward long term incarceration.*

Custody Health Services and Behavioral Health Services provide medical and mental health care that accounts for longer terms of incarceration that came with the State's diversion of State prison inmates to County jails beginning in 2011. As we have noted, provision of programming has improved dramatically since the time these recommendations were presented. The Sheriff's Office's Community College Collaborative gives those completing longer sentences access to quality vocational programs and a host of virtual and in-person classes, with the opportunity to enroll in community college and complete those programs upon release. For those with higher level security classifications – generally those awaiting trial on serious felony charges – creating programming geared toward long term incarceration is more difficult, as noted above.

*121: Expand and offer evidence-based programming opportunities to all detainees interested in participating, regardless of classification or housing assignment. Program options to consider can include but not be limited to life skills, parenting, meditation, recovery, basic literacy skills, GED, college programs, enrichment opportunities, religious study, job preparation, ESL instruction, AA/NA, mental health and wellness and self-improvement. Detainees housed in areas where group instruction is difficult should be offered options via remote teaching on TV's or tablets. Establish a timeline for implementation.*

We reviewed the list of courses currently being offered, in both in-person and remote/virtual formats (via TV's and tablets). They include all the program options listed above, and others.

*122: Increase outreach to the community with volunteer opportunities to provide enrichment programs within all areas of the facilities. Provide expansion through existing systems such as the Chaplains office and other community based or advocacy agencies. Streamline the process for vetting, training and providing clearance for volunteers and advocacy groups to offer programs and services.*

From the time this recommendation was presented until March 2020, the Sheriff's Office had expanded the number of community-based agencies providing services in the jails. The COVID-19 pandemic and associated quarantine requirements ended those programs. The Sheriff's Office reported to us it has been working to bring those programs back. A number of wellness programs have been added to programming efforts, including animal therapy and a meditation program ("Carry the Vision"). Having community-based organizations working with incarcerated individuals is an important part of successful reentry efforts, as these organizations can provide vital connections to community services that individuals need upon release. These organizations also serve an important public transparency function. We will continue to monitor this issue.

*126: Utilize tablets or other available technology for educational materials for programs, so that all inmates who are eligible and who would like to participate, may participate in these programs.*

Tablets were introduced into the jails in 2021, with all facilities going on-line in September 2021. Educational materials comprise a significant portion of the content available on the tablets.

*127: Ensure that inmates who want to participate in programs and are eligible, have the opportunity to participate in programs.*

Rehabilitation Officers in the Programs Unit ensure inmates who are interested in participating in programs are eligible and can do so at both facilities.

*180: Gender-responsive, trauma-informed, recovery-oriented, culturally appropriate programming and services for inmates.*

In January 2022, the Moss Group provided a report to the County: "Santa Clara County Sheriff's Office Elmwood Correctional Complex for Women Gender-responsive Operational Assessment Report." The report contains a section on programming, in which it states:

*Programs at the jail have been undergoing a major transition to orient programs more toward women's specific needs through trauma-informed programming, enhancement of vocational programming, such as welding and CISCO, and planning for transition to the community. Leadership, staff, and community partners interviewed express excitement and hope for the direction the division is taking.*

The Moss Group report provides a number of recommendations for the Sheriff's Office to create more gender-responsive programming opportunities. The County has contracted with The Moss Group into 2024 to follow up on the recommendations in its 2022 Report and to support the Sheriff's Office in becoming more responsive to the needs of the CCW population and the staff, volunteers, and stakeholders who work with them. Continually meeting the goals of this recommendation will be an ongoing effort, but the progress made to dates satisfies the intent of the recommendation.

*339: Establish and develop inmate programming for both pretrial detainees and inmates convicted and serving sentences.*

The Sheriff's Office does not distinguish between pretrial detainees and those that are serving sentences in providing access to programming opportunities. As set out in response to other recommendations, above, the jails have developed programming and transitional services in partnership with local community colleges and others.

*433: Increase the overall participation in educational, comprehensive programs by expanding programs.*

The Sheriff's Office Programs Unit has implemented the Rehabilitation Hybrid Program System that rotates classes every 12 weeks and provides approximately 70 distinct courses that focus on rehabilitation, trauma informed services, substance recovery, life skills, parenting, job development, Career Technical Education, and Education. The Sheriff's Office reports this has led to an overall increase in participation. We reviewed a list of programs that details the names of programs, the program provider, and the unit in which programs are offered and find it to be expansive.

*434: Improve the quality and increase the number of classes offered within the comprehensive programs and to increase services offered to inmates.*

The Sheriff's Office acknowledges that the quantity and quality of programming offered at the time this recommendation was presented was limited. The goal of the recommendation – to improve and increase classes and services – has been met by the addition of the numerous programs referenced throughout this report, including the Sheriff's Office Community College Collaboration and the numerous distinct courses offered to incarcerated individuals by the Rehabilitation Hybrid Program System.

*439: Working with a community organization to implement additional Alcoholics Anonymous and Narcotics Anonymous meetings in the jail.*

The Sheriff’s Office Programs Unit has partnerships with Behavioral Health, Recovery Café, Milpitas Adult Ed, Alcoholics Anonymous (AA), Narcotics Anonymous (NA), and Supportive Transition Empowerment Program (STEP) to increase its in-custody substance abuse recovery services. The Sheriff’s Office also has increased the overall number of in-person and remote meetings for AA and NA.

Recommendation		OCLEM Finding
Summarized: CLS 7		
640	In order to implement the new system, sufficient staff will be required to properly conduct the reclassification interviews. While it is the strong recommendation that all inmates be interviewed, it would be acceptable to only interview inmates who are current assigned to Maximum and Medium custody.	Completed
643	Given the importance of the classification process, it is also recommended that a Captain position be created whose sole duty is to manage the classification system. Currently, the Captain now assigned to classification has too many other important duties that do not allow her to focus on managing the classification system.	Not implemented, but OCLEM agrees with the Sheriff’s Office’s reasons for disagreement and implementation of alternative measures
644	The use of “known management problem” and “gang member” overrides will need to be re-evaluated for inmates who are not demonstrating any negative behavior or conduct. There must be some evidence such as inmates pose a threat to other inmates and staff.	Completed
645	The scale for the reclassification instrument should be modified so that inmates scoring 4 points or less are designated for Minimum custody.	No longer applicable
646	It is recommended that there is no need to create a separate instrument for the female inmates. The proposed system uses objective factors that apply equally to male and female inmates.	Completed

*640: In order to implement the new system, sufficient staff will be required to properly conduct the reclassification interviews. While it is the strong recommendation that all inmates be interviewed, it would be acceptable to only interview inmates who are currently assigned to Maximum and Medium custody.*

The Sheriff’s Office has implemented a new Classification System since the time this recommendation was written. The new system has three classification levels (the



previous classification system had four). Inmates are reclassified every 60 days based on their behavior. Although the Sheriff's Office would appreciate additional staffing to meet the demands of the Classification Unit, existing staff is committed to meeting the demands of the unit.

*643: Given the importance of the classification process, it is also recommended that a Captain position be created whose sole duty is to manage the classification system. Currently, the Captain now assigned to classification has too many other important duties that do not allow her to focus on managing the classification system.*

The Sheriff's Office disagrees with this recommendation. The Captain who oversees the Classification Unit does, indeed, have additional duties, but the unit has a full-time Lieutenant overseeing it. And duties of various Captains have shifted, so that since December 2022, the Captain overseeing the Classification Unit has fewer responsibilities than at the time this recommendation was written. While the Sheriff's Office reports it would appreciate having an additional Captain position in its roster, any new Captain would be assigned based on the needs of the agency and not necessarily be solely assigned to the Classification Unit. OCLEM agrees with the Sheriff's Office's view on this issue.

*644: The use of "known management problem" and "gang member" overrides will need to be re-evaluated for inmates who are not demonstrating any negative behavior or conduct. There must be some evidence such as inmates pose a threat to other inmates and staff.*

The new Classification System is largely behavior based and does not include these overrides. The Sheriff's Office continues to work with James Austin, the expert who designed the system, to customize classification in an effort to increase safety.

*645: The scale for the reclassification instrument should be modified so that inmates scoring 4 points or less are designated for Minimum custody.*

The new Classification system has three classification levels (the previous classification had four) and does not involve the same scoring instrument as the instrument in use at the time this recommendation was written.

*646: It is recommended that there is no need to create a separate instrument for the female inmates. The proposed system uses objective factors that apply equally to male and female inmates.*



The objective factors used in the new Classification System are currently applied to all individuals across the jail system, regardless of gender.

Recommendation		OCLEM Finding
Summarized: OVR 5		
528	Implementation should involve consistent input from inmates, including inmates with disabilities and LGBT inmates, and a diverse group of key community stakeholders.	Completed

*528: Implementation should involve consistent input from inmates, including inmates with disabilities and LGBT inmates, and a diverse group of key community stakeholders.*

This recommendation is somewhat vague with respect to its intended objective. Broadly speaking, however, the Sheriff’s Office receives input from those in custody as well as community stakeholders in a variety of ways. Its work is often brought to the Board during public meetings, where members of the public have an opportunity to provide comment. CCLEM plays an important role in raising community voices around its own initiatives as well as reports provided by the Sheriff’s Office. Additionally, the Inmate Advisory Council, reimplemented as of August 2, 2023, provides an opportunity for input directly to the jail administration.

The rights and needs of individuals in custody with disabilities are currently addressed by a number of provisions in the federal consent decrees, which provide various means of providing input and getting support.

Since the time this recommendation was written, the Sheriff’s Office assigned a deputy to serve as liaison with those in custody who identify as LGBTQ. The LGBTQ Deputy regularly interviews these individuals to learn about their experiences and respond to their needs. Also, Behavioral Health personnel run a meeting in conjunction with the LGBTQ Deputy and the PREA Deputy on LGBTQ+ rights, policies that impact the population, and other requests (such as movies made available on the tablets and specific commissary requests).

Recommendation		OCLEM Finding
Summarized: HST 1		
398	Raise the current minimum educational qualifications for Sheriffs' Correctional Deputy. Additional consideration should be given applicants with a college degree, mental health college courses, criminal justice courses, or behavioral science course work or pertinent work experience in areas of mental health, behavioral science, or criminal justice system. There needs to be further study to determine the appropriate level of college required.	Sheriff's Office disagrees, as to raising minimum educational requirements, and OCLEM concurs. Otherwise, objective met.
399	Coordinate with the County Employee Services Agency the modification of the current minimum qualifications for Sheriff's Correctional Deputy job specification.	
400	Increase staffing in the Background and Recruiting Unit to provide additional time per individual applicant background process and to recruit greater numbers of highly qualified candidates in order to reduce staffing vacancies.	Completed
401	Hire and train an in-house polygrapher and double the amount of polygraph examinations required of applicants.	Completed, as to in-house polygrapher. Sheriff's Office disagrees with recommendation to double the number of examinations. OCLEM concurs.

*398: Raise the current minimum educational qualifications for Sheriffs' Correctional Deputy. Additional consideration should be given applicants with a college degree, mental health college courses, criminal justice courses, or behavioral science course work or pertinent work experience in areas of mental health, behavioral science, or criminal justice system. There needs to be further study to determine the appropriate level of college required.*

*399: Coordinate with the County Employee Services Agency the modification of the current minimum qualifications for Sheriff's Correctional Deputy job specification.*

The Office of the Sheriff maintains qualifications that are consistent with California's Standard and Training for Corrections. Increasing the standards would eliminate otherwise qualified individuals and make it more difficult for the County to bring in candidates. The Office of the Sheriff has significantly increased the amount of training

provided to individuals both during and after the Academy, and disagrees with the recommendation to raise current educational background standards. OCLEM concurs; education and employment background should be significant factors in hiring decisions, but raising minimum requirements could needlessly disqualify otherwise strong candidates.

*400: Increase staffing in the Background and Recruiting Unit to provide additional time per individual applicant background process and to recruit greater numbers of highly qualified candidates in order to reduce staffing vacancies.*

The County recently provided funded positions for Backgrounds and Recruiting to enhance the Sheriff’s Office’s recruiting efforts. The Background and Recruiting Unit also still has some on-loan and extra-help staff in order to increase its staff to enhance its ability to recruit. It has expanded its recruitment efforts locally and nationally to reduce the overall number of vacancies.

*401: Hire and train an in-house polygrapher and double the amount of polygraph examinations required of applicants.*

The Sheriff’s Office recently hired an in-house polygraph examiner for its Backgrounds Unit. Additionally, the County contracts with a number of outside polygraphers that can be used to give candidates greater options with time and locations. The Sheriff’s Office disagrees, and OCLEM concurs, that there is no need to double the number of polygraph examinations currently required.

Recommendation		OCLEM Finding
Summarized: HST 3		
201	Research best practices in correctional learning and develop a new academy and jail training officer program that relies upon adult learning principles.	Completed
205	Current and future jail leadership should immediately engage in opportunities to learn the current best practices of jail operations through educational seminars and information sharing like NIC’s large jail network and American Jail Association Conferences.	Completed
206	Decision makers should tour model facilities and develop ongoing learning relationships with them. The NIC, the state sheriff’s association or state jail association would be good resources to find jails that are well run and of similar complexity to Santa Clara’s.	Completed

*201: Research best practices in correctional learning and develop a new academy and jail training officer program that relies upon adult learning principles.*

The Academy and Jail Training Program have undergone significant updates, and now feature a renewed emphasis on scenario-based training and contemporary adult learning instruction. To support this modernized approach, all academy instructors and Jail Training Officers have completed instructor development training that places a strong focus on adult learning theory and principles. A recent audit from the Board of State and Community Corrections (BSCC) Standard and Training for Corrections (STC) observed:

*[T]he use of varied adult learning methods, such as discussion, small and large group activities, case study vignette, videos, etc. The instructors initiated a lot of good discussion with the participants and created an interactive learning environment.*

The Jail Training Officer<sup>5</sup> training program is now centralized and requires 40 hours of supervision and instruction that mirrors the POST Field Training Officer course and addresses adult learning theory and key teaching styles.

*205: Current and future jail leadership should immediately engage in opportunities to learn the current best practices of jail operations through educational seminars and information sharing like NIC's large jail network and American Jail Association Conferences.*

Custody leaders regularly participate in conferences and outside specialized trainings. These events provide valuable opportunities to learn from experts, exchange ideas, stay up-to-date with industry trends, and hear diverse perspectives. For example, Custody leaders attend the annual American Jail Association Conference and the California Sheriffs' Association Annual Conference and have attended the Women Leaders in Law Enforcement Training Symposium as well as other leadership seminars and programs.

*206: Decision makers should tour model facilities and develop ongoing learning relationships with them. The NIC, the state sheriff's association or state jail association would be good resources to find jails that are well ran and of similar complexity to Santa Clara's.*

In support of their efforts to bring various reform measures and new technology to Santa Clara County, Sheriff's Office Custody leadership has engaged with a number of other

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<sup>5</sup> Jail Training Officers are experienced Correctional Deputies who have the responsibility of serving as mentors and trainers of new Academy graduates in their first months as deputies.

agencies and visited many other jails over the past several years. For example, leaders have visited and toured jails in the following counties: Denver (Colorado), San Diego, San Benito, Santa Cruz, Stanislaus, Monterey, San Joaquin, and Contra Costa. They have collaborated and shared information with their counterparts in a number of other jurisdictions as well, including the Washington State Department of Corrections and San Mateo, San Benito, and Alameda Counties.

Recommendation		OCLEM Finding
Summarized: HST 4		
133	Establish a timeline for implementation for training of staff and reclassification of detainees, and report progress to Board of Supervisors regularly upon implementation.	Completed
137	Review training curriculum, hiring and promotional practices for correction staff with experts knowledgeable in the field. Training for issues of mental health, behavioral needs and mediation techniques should be specific to the work situation inside facilities, which differs from the circumstances faced by patrolling officers.	Completed
138	Specialized training needs to be developed for all staff working with the Mentally Ill. This training must be different from that given to first responders because staff in the jail work with the mentally ill on an ongoing basis rather than responding to an individual incident.	Completed
139	Develop and implement specialized behavioral health and crisis training for correctional officers and other jail staff (including behavioral health staff) that is based upon consultation with outside experts regarding best practices, is tailored to the custodial setting and includes the following topics A. Eliminating stigma around behavioral health disabilities; B. Appropriate response to inmates experiencing behavioral health symptoms or crisis; C. Understanding the rights of inmates with behavioral health disabilities, including the right to reasonable accommodations; D. De-escalation techniques and trauma-informed care; and E. Connecting inmates with appropriate jail services and resources.	Completed
140	Staff should be allowed to attend 24 hours update training away from their work area in order to achieve effectiveness of the training. Staff should not sit at the floor station (work area: while performing their duties and taking classes on the computer.	Completed
141	Department needs to bring back the Interpersonal Communication Skills class.	Completed
142	All custody staff should be trained in CIT or at minimum a similar type of training that is Evidenced based.	Completed

Recommendation		OCLEM Finding
143	All CIT trained individuals should be mandated to take a CIT refresher course every 3 or 5 years.	Completed
144	The entire CIT Course used to train officers needs to be evaluated by an outside entity to assess whether or not there is material in the course that may be deemed racist, culturally inappropriate, stigmatizing, and/ or discriminatory. This needs to include every aspect of the course like outside Presenters, material pulled from the internet and used in the training, etc.	Completed
145	Training in the areas of cultural competency, implicit bias, and procedural justice be brought to current correctional deputies and the Academy.	Completed
203	Develop at least a two-year in-service training calendar that not only covers the necessary skills like firearms qualification, but also classes on communication, inmate rights and legal processes like the Prison Rape Elimination Act, inmate discipline rights and grievance processes.	Completed
343	Ensure that staff are adequately trained in, understand, and consistently apply the Prison Rape Elimination Act (PREA) legal requirements.	Completed
346	A special emphasis on appropriate use of force should be included in policies, procedures, and the training of staff.	Completed
453	Once policies, procedures, practices, forms, and inmate handbook are revised and adopted, train all staff on the revisions.	Completed
458	Implement a “train-the-trainer” program to provide for jail-specific mental health training needs. Such a program would allow for qualified trainers to provide mental health training to correctional staff, re-fresher trainings, and ensure that the training principals are being implemented throughout the custody facilities.	Objective met
461	Provide PREA (Prison Rape Elimination Act) training to all correctional deputies that have not yet received it.	Completed
462	Implement training modules for existing staff and academy recruits to ensure compliance with the revised use of force policy.	Completed
465	Develop an eight-hour training curriculum for all staff to ensure a proper understanding and application of the department’s updated Use of Force policy.	Completed
503	Jail staff and leadership should receive training on what types of conduct constitute prohibited conduct under PREA.	Completed
538	The Office of the Sheriff should develop or select a custody-centric Crisis Intervention Team training program for the Custody Bureau by December 31, 2016, for immediate implementation.	Completed

Recommendation		OCLEM Finding
539	The Office of the Sheriff should add content on dealing with mentally ill inmates to the Probationary On-the-Job Training manual. Evaluation criteria should include interaction with mentally ill inmates and those with developmental disabilities, de-escalation techniques, and appropriate use of force.	Completed
540	The Office of the Sheriff should continue training of custody staff to implement trauma-informed strategies.	Completed

*133: Establish a timeline for implementation for training of staff and reclassification of detainees, and report progress to Board of Supervisors regularly upon implementation.*

The Classification Unit staff received training on the new JFA Classification System and Tool prior to its implementation in December of 2016. The training was conducted via a Test-Training e-environment for the JFA Classification and Scoring Tool. The training environment used actual inmate data for authenticity. Dr. Austin, the proprietor of the JFA Classification System made frequent visits to ensure that the tool was being used and trained correctly. All new arrestees being housed were classified using the new system and tool starting in March of 2017 when the new system went fully live. The individuals who were already in custody at the time of implementation, including those in restrictive housing, were given their first re-classification review using the new system and tool in May of 2017. Since that time, all individuals who require a re-classification review receive a review every 60 days.

*137: Review training curriculum, hiring and promotional practices for correction staff with experts knowledgeable in the field. Training for issues of mental health, behavioral needs and mediation techniques should be specific to the work situation inside facilities, which differs from the circumstances faced by patrolling officers.*

*138: Specialized training needs to be developed for all staff working with the Mentally Ill. This training must be different from that given to first responders because staff in the jail work with the mentally ill on an ongoing basis rather than responding to an individual incident.*

*139: Develop and implement specialized behavioral health and crisis training for correctional officers and other jail staff (including behavioral health staff) that is based upon consultation with outside experts regarding best practices, is tailored to the custodial setting and includes the following topics A. Eliminating stigma around behavioral health disabilities; B. Appropriate response to inmates experiencing*



*behavioral health symptoms or crisis; C. Understanding the rights of inmates with behavioral health disabilities, including the right to reasonable accommodations; D. De-escalation techniques and trauma-informed care; and E. Connecting inmates with appropriate jail services and resources.*

The mental health training designed for the Custody Bureau is tailored specifically to suit the unique demands of custody operations. It was developed in close collaboration with the County's behavioral health resources, exceeds the hourly requirements established by the Board of State and Community Corrections (BSCC) Standard and Training for Corrections (STC), and has been approved by the federal monitors and their subject matter experts.

The Custody Academy emphasizes mental health, de-escalation, and communication skills. For example, the BSCC STC Adult Correctional Officer Core includes a substantial focus on behavioral health, including:

- 20.1: Signs And Symptoms Of Substance Abuse - 2 hours
- 20.2: Trauma - 2.5 hours
- 20.3: Interventions And Resources - 4 hours
- 20.4: Stigma And Bias - 1 hour
- 20.5: Roles And Responsibilities - 2 hours
- 20.6: Liability - 1 hour
- 20.7: Suicide Prevention - 7 hours
- 20.8: Foundation And Definitions: Signs And Symptoms - 2.5 hours
- 20.9: Safety - 1.5 hours
- 20.10: Emotional Survival - 2 hours
- 4.1: Interpersonal Communication - 7 hours
- 4.2: Crisis Communication And De-Escalation - 5 hours
- 4.3: Effective Communication - 6 hours

The Training Division facilitates the Crisis Intervention Team (CIT) training in collaboration with Santa Clara County Behavioral Health and many volunteers and non-profit organizations. This 24-hour training is POST-certified and follows the CIT International model. In addition, the Academy includes Custody Bureau-specific training on agency policy and operations, focused on mental health, suicide prevention, and de-escalation.

Custody also conducts in-service training in these areas, including a recent 4-hour session developed in collaboration with Behavioral Health.



Finally, in our conversations with Training Division leaders, we learned about a number of ongoing efforts to continue to refine Custody's behavioral health-related trainings, including a Corrections-based "Mental Health First Aid" training that the Sheriff's Office would like to add to its curriculum. We found Training to be knowledgeable and engaged on these issues. (See also 538, below)

*140: Staff should be allowed to attend 24 hours update training away from their work area in order to achieve effectiveness of the training. Staff should not sit at the floor station (work area) while performing their duties and taking classes on the computer.*

It is not entirely clear, but we believe this refers to the annual STC 24-hour Continuing Professional Training requirement. We have reviewed the schedule of Annual Recurring Minimum Training Requirements for 2024. It includes 29 hours of in-person training and 14 hours of online class hours. While some of the online hours may be completed while deputies are on duty at a floor station because of staffing concerns, the vast majority of all mandated annual training is completed in-person.

*141: Department needs to bring back the Interpersonal Communication Skills class.*

The Academy curriculum includes 7 hours of interpersonal communication skills as part of the BSCC STC Core, and communication skills are emphasized throughout the academy through scenarios, de-escalation training, and other types of facilitated learning. For the past several years, Academy and in-service training has included the 4-hour POST-certified Strategic Communication training.

*142: All custody staff should be trained in CIT or at minimum a similar type of training that is Evidenced based.*

CIT training for all staff has been a long-standing Sheriff's Office initiative and a negotiated requirement for compliance with the federal consent decree. Twenty-four hours of CIT training is included in the Academy curriculum. There are still some Correctional Deputies (fewer than 100) who have not yet been through the full CIT course, and getting all of them through this extensive training is a high priority for the Training Division. Nonetheless, all Correctional Deputies attend a mandatory annual 4-hour mental health training. (See also 538, below)

*143: All CIT trained individuals should be mandated to take a CIT refresher course every 3 or 5 years.*

CIT-related topics form a key part of the annual 4-hour mental health training, which is mandatory for all custody staff for compliance with the *Chavez* remedial plan. (See also 538, below)

*144: The entire CIT Course used to train officers needs to be evaluated by an outside entity to assess whether or not there is material in the course that may be deemed racist, culturally inappropriate, stigmatizing, and/ or discriminatory. This needs to include every aspect of the course like outside Presenters, material pulled from the internet and used in the training, etc.*

The CIT course used by the Sheriff's Office was developed based on the CIT International Model and is POST-certified to meet the California state CIT training objectives. Many community members and non-profit organizations also help teach the course. The Training Division staff periodically conducts a complete review of this (and every) course, to monitor content and refresh the course materials. (See also 538, below)

*145: Training in the areas of cultural competency, implicit bias, and procedural justice be brought to current correctional deputies and the Academy.*

The Academy curriculum currently includes two hours of Cultural Diversity, Implicit Bias, and Ethnic Disparity in the BSCC STC Core curriculum, and an additional eight hours of Implicit Bias training that Training has added to the STC minimum. Recruit and in-service training also includes the "Blue Courage" program, a leadership development program based on a philosophy of service and personal growth.

*203: Develop at least a two-year in-service training calendar that not only covers the necessary skills like firearms qualification, but also classes on communication, inmate rights and legal processes like the Prison Rape Elimination Act, inmate discipline rights and grievance processes.*

The Training and Professional Development Division operates with an annual training plan, supplemented by training sessions tailored to emerging needs or demands, such as the introduction of new technology or equipment. OCLEM has reviewed the current training calendar. Training reports that its current total training hours are primarily dedicated to required topics due to limitations associated with current staffing restraints. But these mandatory hours include PREA training, as well as subjects that focus on communication skills and the rights of individuals in custody (suicide prevention, mental health, and Americans with Disabilities Act, for example).

*343: Ensure that staff are adequately trained in, understand, and consistently apply the Prison Rape Elimination Act (PREA) legal requirements.*

*461: Provide PREA (Prison Rape Elimination Act) training to all correctional deputies that have not yet received it.*

*503: Jail staff and leadership should receive training on what types of conduct constitute prohibited conduct under PREA.*

All Correctional Deputies have received PREA training. Current policy mandates all Sheriff's Office/DOC employees and all other county employees working/assigned to perform services for the agency to receive PREA training within 90 days of hire and take refresher training every two years. The Sheriff's Office provides this training to all recruits at the Academy. Refresher training is provided bi-annually to all staff online via training website. Contractor/Volunteer training is offered to all contractors and volunteers online via Sheriff's office website. Training consists of the following topics: zero tolerance policy; staff responsibilities per policy; inmate rights to be free from sexual abuse, assault, misconduct, and harassment; rights to be free from retaliation; dynamics of sexual abuse; common reactions from victims of sexual abuse; how to detect and respond to signs of threatened and actual sexual abuse; avoiding unauthorized and inappropriate relationships with inmates; effective and professional communication, particularly with the LGBTQI population; and compliance with mandatory reporting laws.

*346: A special emphasis on appropriate use of force should be included in policies, procedures, and the training of staff.*

The Use of Force Policies and training within the Sheriff's Office Custody Bureau (Policy 511) emphasizes the concept of Appropriate Force. This entails using force that is objectively reasonable, necessary, proportional, and consistent with policy. The 12-hour training around the policy uses scenarios and practical examples to teach these concepts and to emphasize the importance of de-escalation.

*453: Once policies, procedures, practices, forms, and inmate handbook are revised and adopted, train all staff on the revisions.*

Staff are trained on all updated policies, procedures, and practices as appropriate to address the revision: a simple change in directive may only need staff training during a squad meeting, but a major change may require formalized training by the Training Division. Any policy changes that impact the organization broadly and will require

formal training are shared with the Training Division prior to being implemented so that Training can plan for and adopt any needed changes to their course curricula. The Professional Standards Unit is responsible for updating the Inmate Orientation and Rulebook as relevant policies are updated.

*458: Implement a “train-the-trainer” program to provide for jail-specific mental health training needs. Such a program would allow for qualified trainers to provide mental health training to correctional staff, re-fresher trainings, and ensure that the training principals are being implemented throughout the custody facilities.*

The Sheriff's Office continues partnering with Custody Health and Behavioral Health to develop training curriculum. Under the guidance of the consent decree monitors, this partnership has developed several courses around jail-specific topics and needs. Training continually explores state and national programs, like those offered by the National Institute of Corrections and various other entities, to keep its trainers updated with best practices in mental health training. Training Bureau personnel teach these important courses. (“Train-the-trainer” programs generally mean that Training staff provide instruction to designated personnel at various facilities or units, and those individuals in turn teach classes to others.)

*462: Implement training modules for existing staff and academy recruits to ensure compliance with the revised use of force policy.*

*465: Develop an eight-hour training curriculum for all staff to ensure a proper understanding and application of the department’s updated Use of Force policy.*

The training program for correctional recruits at the academy has been carefully designed to instill a thorough understanding of the office’s policies on the use of force. This training is not isolated but rather a continuation and reinforcement of constitutional use of force principles and policies introduced and emphasized throughout various stages of the curriculum, including the STC Core curriculum and POST-certified courses on Laws of Arrest. After completion of these classes, recruits undergo an intensive, 12-hour training day dedicated to the use of force policies while at the Academy. This training utilizes STC-certified curriculum and is designed to prepare recruits for working in the County’s jail through the use of scenario-based training that emphasizes Sheriff’s Office use of force policies.

For existing staff, an 8-hour use-of-force training was previously provided, as it related to the prior Use of Force Policy. Since fall of 2022, the Training Division has developed and delivered an STC-certified 12-hour Use of Force Policy Training on the new/current

use of force policy. To ensure a proper understanding of the concepts included in the new use of force policy, the 12-Hour class include two hours of practical Defensive Tactics and Arrest Control training, including policy application in hands-on scenario situations.

Approximately 96% of sworn staff has attended this 12-hour training. As of the end of 2023, only 28 deputies had not yet completed it. Most of these 28 are on extended leave for various reasons, such as injury or administrative leave and are unavailable to attend training. The Training and Professional Development Division proactively coordinates with the respective divisions to ensure these staff receive the training upon returning to work.

*538: The Office of the Sheriff should develop or select a custody-centric Crisis Intervention Team training program for the Custody Bureau by December 31, 2016, for immediate implementation.*

The Sheriff's Office has adopted a multifaceted approach to Crisis Intervention Training (CIT), drawing on the CIT International Model, a state-mandated curriculum developed for the BSCC STC, and specialized mental health training modules created in partnership with Custody Health. This comprehensive training includes a mandatory 4-hour mental health block and a 2-hour Suicide Prevention course, both required by the federal consent decree, as well as various other course topics that cover mental and behavioral health crises, including the use of force. In addition, the Office is collaborating with experts to develop an extra 4-hour course focusing on severe mental illness to satisfy another provision of the consent decree. Concurrently, Training Division is planning its approach to a new STC mandate (beginning in 2025) that will require an additional 4-hours of mental health training for all correctional staff statewide.

*539: The Office of the Sheriff should add content on dealing with mentally ill inmates to the Probationary On-the-Job Training manual. Evaluation criteria should include interaction with mentally ill inmates and those with developmental disabilities, de-escalation techniques, and appropriate use of force.*

A substantial portion of the Jail Training Program requires probationary Correctional Deputies to demonstrate skills, concepts, and approaches taught in the Academy, such as empathy, compassion, patience, de-escalation techniques, strategic communication, reasonable force application, and adherence to applicable policies. These skills are crucial for effective law enforcement and custodial management, ensuring a balanced approach to various situations while upholding professional standards.

*540: The Office of the Sheriff should continue training of custody staff to implement trauma-informed strategies.*

Trauma-informed strategies are particularly important in a custody setting because of the prevalence of trauma and post-traumatic stress symptoms among incarcerated individuals. The language of this recommendation acknowledges that, even at the time, custody training employed trauma-informed strategies. This approach continues.

For example, the STC-certified Gender Responsiveness training not only includes trauma-informed discussions but also practical training aspects. And the STC core curriculum includes a course on Trauma that dedicates 2.5 hours to trauma-informed responses. This includes recognizing signs and symptoms of trauma and fostering appropriate interactions with individuals who have suffered trauma. Another class focuses on Emotional Survival and delves into trauma-informed perspectives specifically tailored for Correctional Deputies. It addresses how they manage trauma, including the vicarious and secondary traumas inherent in working within a custody setting.

Recommendation		OCLEM Finding
Summarized: HST 5		
107	Using memorandum or directives should be a short-term solution. Department needs to get more funding and staff to make it a priority to update policies and procedures.	Completed
202	Establish clear policies as to when deputies, who are still in training, can be in solo assignments and for how long.	Completed
442	Add an analyst for each custody facility to collect and process grievances from lock boxes and enter grievances into the new grievance tracking system. Analysts will be required to immediately notify custody supervisors of any basic needs grievances so that they may be resolved as soon as possible. All other grievances will be routed to the appropriate unit for expeditious action. The analyst positions are included in the Sheriff's Office Fiscal Year 2016-2017 budget request.	Objective met
443	Add a Lieutenant at each facility who will ensure a proper and timely resolution of grievances. The Lieutenant will be empowered to immediately resolve all "basic needs" grievances. The Lieutenant positions are included in the Sheriff's Office Fiscal Year 2016/2017 budget request.	Objective met
444	Add a specially trained correctional deputy to each facility who will conduct interactive, instructional classes for inmates in all housing units on expected behavior in custody.	Sheriff's Office disagrees. OCLEM concurs.



Recommendation		OCLEM Finding
446	Establish a team to respond to crisis situations and/or tactical situations involving those with mental health or other special needs.	Completed

*107: Using memorandum or directives should be a short-term solution. Department needs to get more funding and staff to make it a priority to update policies and procedures.*

In December 2023, the County funded an additional Captain and Sergeant to oversee the Sheriff’s Office Professional Standards and Compliance Division. They, along with a team of two deputies, work in collaboration with the Operational and Inspections Unit to update all Custody Bureau Policies and Procedures. Because some new policies or policy revisions are subject to “meet and confer” requirements with the County’s different labor unions, and in some cases the Prison Law Office, the actual time it takes for a policy to be finalized and implemented can vary widely.

*202: Establish clear policies as to when deputies, who are still in training, can be in solo assignments and for how long.*

The Jail Training Program has established policies about the level of supervision required for newly-graduated deputies in the program. In the initial 10-week phase, trainees must work under the direct supervision of a Jail Training Officer (JTO). Any trainee on a remedial training plan or displaying performance deficiencies must also be under direct supervision. Once trainees are through this initial phase, they may work in a regular staff position, but still need to remain in the immediate proximity of their JTOs.

*442: Add an analyst for each custody facility to collect and process grievances from lock boxes and enter grievances into the new grievance tracking system. Analysts will be required to immediately notify custody supervisors of any basic needs grievances so that they may be resolved as soon as possible. All other grievances will be routed to the appropriate unit for expeditious action. The analyst positions are included in the Sheriff’s Office Fiscal Year 2016-2017 budget request.*

The Sheriff’s Office has initiated significant reforms to its process for handling grievances since the time this recommendation was drafted. It has created a Grievance Unit that is staffed with professional (not sworn) staff who collect and process grievances, satisfying the objective of this recommendation.

*443: Add a Lieutenant at each facility who will ensure a proper and timely resolution of grievances. The Lieutenant will be empowered to immediately resolve all “basic needs” grievances. The Lieutenant positions are included in the Sheriff’s Office Fiscal Year 2016/2017 budget request.*

The Sheriff’s Office Grievance Unit (created with positions funded through the County’s budget process) is overseen by a Lieutenant who has the ability to resolve issues that arise in grievances. The professional staff are trained in which grievances should be escalated to the Lieutenant’s attention. While there is not a Lieutenant at each facility dedicated solely to resolving grievances, we find the creation of the Grievance Unit satisfies the objective of this recommendation.

*444: Add a specially trained correctional deputy to each facility who will conduct interactive, instructional classes for inmates in all housing units on expected behavior in custody.*

The Sheriff’s Office disagrees with this recommendation. Dedicating a deputy at each facility to instruct those in custody on expected behavior is not an efficient use of limited staffing. OCLEM agrees. Deviations from behavioral expectations are not likely to be remedied through instructional classes.

*446: Establish a team to respond to crisis situations and/or tactical situations involving those with mental health or other special needs.*

The Custody Bureau created “Multi-Support Deputies” (MSDs), specialized deputy positions that meet weekly with mental health clinicians in the jail to establish and maintain clear lines of communication and address specific problems. They do rounds throughout housing areas for those with serious mental illness, and commonly respond to situations that module deputies do not have the time or capacity to manage effectively. MSDs are selected for their disposition, skill, and interest in working with those with mental illness.

In 2019, Custody Bureau had 24 designated MSDs. Those positions were lost to budget cuts in 2020, but the items have since been reinstated and the Sheriff’s Office is working to re-staff those positions.



Recommendation		OCLEM Finding
Summarized: ISV 2		
167	Visitor Lobby – Visitors who are preregistered and sign up online should check in 15-30 minutes prior to their scheduled visit (current requirement is 45 minutes to one hour). Visit cancellations should be immediately updated for the public via the internet and visiting phone line voicemail.	Completed
168	Visitor Lobby – Visitors should be allowed to visit their inmate even though they arrive after the 60-minute rule (they must be present at least 60 minutes before the appointment). Many families travel great distances. Perhaps within the 60 to 30 minute limit should be allowed.	Completed
169	Re-evaluate the visiting rules and requirements with the goal of “assisting” families and loved ones to visit incarcerated.	Objective met
334	Ensure that visitation accommodations for inmates, legal counsel, and family/friends are established, including: sufficient space for the volume of visits, based on the inmate population; accommodations that are supportive of all parties’ interest in establishing and maintaining the human dignity of inmates and families; and an easily accessible visitation appointment and cancellation system.	Largely complete; space for official visits is an ongoing challenge

*167: Visitor Lobby – Visitors who are preregistered and sign up online should check in 15-30 minutes prior to their scheduled visit (current requirement is 45 minutes to one hour). Visit cancellations should be immediately updated for the public via the internet and visiting phone line voicemail.*

Currently, visitors must arrive 30 minutes prior to the scheduled visiting time. Visits that are cancelled due to unforeseen circumstances are updated in the system by the visiting staff and available for rescheduling.

*168: Visitor Lobby – Visitors should be allowed to visit their inmate even though they arrive after the 60-minute rule (they must be present at least 60 minutes before the appointment). Many families travel great distances. Perhaps within the 60 to 30 minute limit should be allowed.*

Custody Bureau changed the arrival requirement to 30 minutes at both Main Jail and Elmwood facilities.

*169: Re-evaluate the visiting rules and requirements with the goal of “assisting” families and loved ones to visit incarcerated.*

It is not clear what type of assistance this recommendation envisioned. Current visiting rules and requirements comply with relevant laws and regulations regarding access

issues. The video visitation system that Custody expects to bring on-line in the coming months is intended to supplement but not supplant in-person visitation. This will allow individuals to visit using a smartphone or similar device and will greatly expand visitation opportunities, particularly for children or those who might otherwise need assistance.

*334: Ensure that visitation accommodations for inmates, legal counsel, and family/friends are established, including: sufficient space for the volume of visits, based on the inmate population; accommodations that are supportive of all parties' interest in establishing and maintaining the human dignity of inmates and families; and an easily accessible visitation appointment and cancellation system.*

The Sheriff's Office allows incarcerated individuals to have visits with family and friends as facility schedules, space, and number of personnel allowed. Each individual may have two 60-minute visits each week. Visiting schedules and procedures are accessible on the Sheriff's Office website, where visits can be scheduled and changed via computer, cell phone, tablet, or similar device.

The current and established visiting space is sufficient to accommodate at least two social visits per individual each week. However, space for visits with counsel or other professionals at Main Jail continues to be a challenge that the Sheriff's Office reports has no current feasible solution considering the current physical makeup of the jail facilities.

Recommendation		OCLEM Finding
Summarized: ISV 3		
72	Storage: Larger or more bins to store belongings such as books, legal papers, hygiene products, etc.	Objective met
73	Commissary Prices: Prices for all commissary items should be reduced by 10%-15%.	Completed
74	Prices of goods sold to inmates should be monitored and updated.	Completed
84	The IWFC should review all commissary vendor contracts and recommend whether or not these contracts should be renewed.	Objective met
85	The IWFC should review and monitor pricing of commissary items and recommended adjustments to those prices.	Objective met
86	The IWFC should ensure that all mark-ups are reasonable and that markups are not disproportionately higher for female products than for male products.	Objective met

Recommendation		OCLEM Finding
87	The Board of Supervisors should evaluate the cost of having the commissary run in-house.	Completed
88	Inmate should be permitted to inspect purchased items from the commissary before signing off for those items.	Completed
174	The County should review its current model of providing commissary to inmates with a view toward providing a variety of products at prices that are reasonable and fair to family and friends who pay into the commissary system and ensuring that any profit made is funneled back into the IWF, rather than to a third-party vendor. This review should re-examine the outsourcing of the commissary system to third party for-profit vendors and identify a variety of models of "in house," jail-administered commissary systems that can be administered efficiently while providing reasonable prices to inmates and families.	Completed

*72: Storage: Larger or more bins to store belongings such as books, legal papers, hygiene products, etc.*

Since the time this recommendation was written, the Sheriff’s Office has experimented with additional storage bins in the housing units. In general, the bins tended to collect stored food and waste that attracted insects and rodents. A significant change in the way hygiene products are distributed may alleviate the need for extra storage, however. These products are now readily available in all housing units, so there is no need to maintain a large stash in one’s cell. This was not the case when this recommendation was developed.

Pro Per inmates, however, do require additional space to store their legal documents and books. They are allowed to either maintain an extra storage bin in their housing unit or are allowed to store their information in a law library within their housing area.

To the extent storage continues to be a concern, it is the type of issue the Inmate Advisory Council may be well-positioned to address.

*73: Commissary Prices: Prices for all commissary items should be reduced by 10%-15%.*

*74: Prices of goods sold to inmates should be monitored an updated.*

On May 23, 2017, the Sheriff’s Office presented to the Board an amendment to the contract with the commissary vendor (Aramark). The County was able to reduce the cost of commissary items by up to 50% by re-negotiating the prices and eliminating the

portion of revenue being deposited into the Inmate Welfare Fund. By opting instead to fund all service costs through the General Fund, the County was able to greatly reduce commissary prices.

*84: The IWFC should review all commissary vendor contracts and recommend whether or not these contracts should be renewed.*

Board policy dictates that contracts such as the one with the commissary vendor can extend to a maximum term of five years. Once that term is up, the Sheriff's Office must go through a competitive procurement process to identify a new vendor. Exceptions to the five-year rule must go through an approval process and cannot be granted simply because the agency doesn't want to search for a new vendor. The current contract with Aramark was approved in June 2022.

Additionally, the Inmate Welfare Fund Committee (IWFC) only continues to exist on paper; in practice, no funds are being added to the Inmate Welfare Fund, and any funds spent from the account are presented to and approved directly by the Board, which has essentially assumed the role of the IWFC.

*85: The IWFC should review and monitor pricing of commissary items and recommended adjustments to those prices.*

*86: The IWFC should ensure that all mark-ups are reasonable and that markups are not disproportionately higher for female products than for male products.*

To the extent these recommendations suggest that pricing should be monitored and adjusted outside of the procurement process, the Sheriff's Office disagrees because it is not feasible. Commissary vendors are selected through a competitive process, prices are negotiated at that time, and are not subject to renegotiation during the life of the contract. At renewal time, the commissary contract is presented to the Board. The Board has the option to review the contract and pricing and determine whether the pricing is fair and proportionate before entering into a new one.

*88: Inmate should be permitted to inspect purchased items from the commissary before signing off for those items.*

The Sheriff's Office has worked with Aramark to improve the commissary system, including providing individuals the opportunity to inspect purchased items before signing for their purchase.

*87: The Board of Supervisors should evaluate the cost of having the commissary run in-house.*

*174: The County should review its current model of providing commissary to inmates with a view toward providing a variety of products at prices that are reasonable and fair to family and friends who pay into the commissary system and ensuring that any profit made is funneled back into the IWF, rather than to a third-party vendor. This review should re-examine the outsourcing of the commissary system to third party for-profit vendors and identify a variety of models of “in house,” jail-administered commissary systems that can be administered efficiently while providing reasonable prices to inmates and families.*

The Sheriff’s Office considered this recommendation in 2017 and explored the possibility of running its own commissary system in the jail. At the time, it concluded that an in-house commissary could not provide a wide enough selection of items at a reasonable price. However, the Sheriff’s Office is again exploring this possibility and plans to provide a report to the Board later this year on potential options.

The Sheriff’s Office no longer charges additional costs for the Inmate Welfare Fund and does not profit from commissary sales.

Recommendation		OCLEM Finding
Summarized: ISV 5		
66	Contract with an outside agency to rewrite the Inmate Rulebook so that it contains accurate information, larger font, is reader-friendly, and available in languages other than English. Do not finance this rewrite with Inmate Welfare Funds.	Objective met
67	Inmate Rulebook should be revised with respect to structure, language, simplification, and should be aimed at a common reading level around 4th or 5th grade.	Completed
68	Ensure the “Inmate Orientation and Rulebook” grievance procedure forms and other important documents are available in English, Spanish, Vietnamese, and other languages. Also ensure the videos shown at inmate intake are available in multiple languages.	Completed
69	Revise and simplify the “Inmate Orientation and Rulebook.”	Completed
70	Rulebook should be written in threshold languages and there should be someone who can orient new inmates by explaining the main issues of the rulebook. The Rulebook should be part of an in-person orientation of new inmates.	Completed

Recommendation		OCLEM Finding
71	Rewrite and organize the inmate rulebook with larger print and have audio and video forms of it.	Completed
336	Ensure that inmates receive clear, easily accessible, and language appropriate information about the inmate classification system and inmates' rights and responsibilities.	Completed
407	Develop multi-lingual written educational materials to inform inmates of their rights while in custody, the grievance process, and how to file a grievance. These materials would be distributed to those in custody during the intake process.	Completed
408	Create an easy-to-understand, multi-lingual grievance intake form with simple directions on how to fill out the form.	Completed
410	Create multi-lingual written materials that detail in-custody rules, expected inmate behavior and consequences of rule violations. These materials would be distributed and explained to each inmate upon intake into custody.	Completed
412	Assign custody staff to reinforce, re-educate, and remind inmates of their expected behavior while in custody. Continuous education is intended to reduce the number of infractions issued and create a more cohesive environment.	Sheriff's Office disagrees. OCLEM concurs.
413	Revise Inmate Handbook and Orientation process to ensure inmates clearly understand how to access timely healthcare and to file healthcare grievances.	Completed

*66: Contract with an outside agency to rewrite the Inmate Rulebook so that it contains accurate information, larger font, is reader-friendly, and available in languages other than English. Do not finance this rewrite with Inmate Welfare Funds.*

*67: Inmate Rulebook should be revised with respect to structure, language, simplification, and should be aimed at a common reading level around 4th or 5th grade.*

*68: Ensure the "Inmate Orientation and Rulebook" grievance procedure forms and other important documents are available in English, Spanish, Vietnamese, and other languages. Also ensure the videos shown at inmate intake are available in multiple languages.*

*69: Revise and simplify the "Inmate Orientation and Rulebook."*

*70: Rulebook should be written in threshold languages and there should be someone who can orient new inmates by explaining the main issues of the rulebook. The Rulebook should be part of an in-person orientation of new inmates.*

*71: Rewrite and organize the inmate rulebook with larger print and have audio and video forms of it.*

The Inmate Orientation and Rulebook has been re-written twice since this recommendation was made. The current version is written at a low reading level, is in ADA-compliant 16-point font, and also available on inmate tablets. The Custody Bureau is working with the tablet vendor to enhance the talk/text feature of the tablet to include an audio version of the content. The Rulebook is available in three languages (English, Spanish, and Vietnamese).

The book was not written by an outside agency but was prepared by Sheriff's Office personnel. No funds from the Inmate Welfare Fund were used for this purpose. Individuals may ask housing unit deputies if they have more questions about the content.

OCLEM has reviewed the Rulebook and finds it to be well organized, easy to read, and informative. It uses simple definitions and examples to better illustrate the content and includes a well-developed table of contents.

*336: Ensure that inmates receive clear, easily accessible, and language appropriate information about the inmate classification system and inmates' rights and responsibilities.*

*407: Develop multi-lingual written educational materials to inform inmates of their rights while in custody, the grievance process, and how to file a grievance. These materials would be distributed to those in custody during the intake process.*

*408: Create an easy-to-understand, multi-lingual grievance intake form with simple directions on how to fill out the form.*

*410: Create multi-lingual written materials that detail in-custody rules, expected inmate behavior and consequences of rule violations. These materials would be distributed and explained to each inmate upon intake into custody.*

*413: Revise Inmate Handbook and Orientation process to ensure inmates clearly understand how to access timely healthcare and to file healthcare grievances.*

The Inmate Orientation and Rulebook is written in three languages and is provided to individuals during the booking process. It clearly explains the rights and responsibilities of individuals in custody. Among many other things, it contains sections on:



- **Classification.** It describes the classification system in a way that is easy to understand and answers basic questions about classification levels and the processes around re-evaluation of classification.
- **Grievance procedures.** It answers questions and provides instructions about how to file a grievance, what to expect from the Sheriff’s Office in response, and how to file an appeal.
- **Discipline Process.** It outlines various types of violations and potential consequences for violations.
- **Healthcare.** It explains how to file a request for healthcare services as well as how to file a grievance related to healthcare issues.

*412: Assign custody staff to reinforce, re-educate, and remind inmates of their expected behavior while in custody. Continuous education is intended to reduce the number of infractions issued and create a more cohesive environment.*

Similar to Recommendation 444 above, the Sheriff’s Office disagrees with this recommendation. Having staff assigned to educate and remind individuals in custody of their expected behavior is not an efficient nor effective use of limited staffing. OCLEM agrees.

Recommendation	OCLEM Finding
Summarized: ISV 6	
62 Outside of the formal grievance process, create a venue for current detainees to present concerns related to the jails, conditions of confinement or problems associated with incarceration within our county. Provide an opportunity for these concerns to be heard by a body that can mediate and respond such as an Ombudsman program and/or ongoing anonymous surveys. Seek best practice information for this need and examples of providing input for improvement from detainees used in other areas.	Completed
63 Beyond the grievance process, provide additional anonymous methods of surveying detainees regarding jail conditions and use that information to intervene where indicated. Consider adopting successful practices from other counties which were developed with best practices in mind. Consider having this a function of an outside agency such as the JOP.	Objective met
64 Create an Inmate Council which represents inmates in various buildings.	Completed



Recommendation		OCLEM Finding
65	Allow inmates to form Committees and designate inmate leaders/representatives by Housing Units, etc. The leader is voted in by peers and all leaders would come together for regular meetings by jail location to make real decisions and changes in the jail.	Completed
110	A formal jail liaison should be designated by Behavioral Health and programs and local to improve communication and coordination between the jail and agencies involved in discharge planning and pre and post adjudication services for offenders with mental illness.	Objective met
165	Outside of the formal grievance process, create a venue for families, friends, and advocacy groups to present concerns related to the jails, conditions of confinement, or problems associated with incarceration within our county.	Completed
191	Consider using data from inmate surveys as a tool to assess operations and understand inmate perceptions.	Completed
197	Create incentives for prosocial inmate behavior.	Completed
406	Circulate an RFP for a tablet device capable of allowing inmates to electronically file grievances, request forms, and request medical, psychiatric and dental services.	Objective met, to the extent currently possible given existing privacy laws impacting medical records
523	The jail should establish an inmate committee to provide ongoing input regarding the grievance and complaint process and other issues.	Completed

*62: Outside of the formal grievance process, create a venue for current detainees to present concerns related to the jails, conditions of confinement, or problems associated with incarceration within our county. Provide an opportunity for these concerns to be heard by a body that can mediate and respond, such as that an Ombudsman program and/or ongoing anonymous surveys. Seek best practice information for this need and examples of providing input for improvement from detainees used in other areas.*

The County has created an Adult Custody Office of the Ombuds to assist with concerns over the jail. This service is managed by the SCC Office of Mediation and Ombuds Services. The service can be reached by both individuals in custody and outside of custody. From inside custody, the call can be reached by speed dial and is not recorded or monitored. Information about this service is available on the inmate tablets in three languages.

Additionally, the County created the Community Correction and Law Enforcement Monitoring Committee (CCLEM) to serve as a focal point for community engagement and provide a forum for consideration of community concerns, including issues surrounding the jails. CCLEM recently formed a subcommittee aimed at exploring ways it can more effectively engage with currently incarcerated individuals. OCLEM is supporting those efforts.

*63: Beyond the grievance process, provide additional anonymous methods of surveying detainees regarding jail conditions and use that information to intervene where indicated consider adopting successful practices from other counties which were developed with best practices in mind. Consider having this a function an outside agency such as the JOP.*

*191: Consider using data from inmate surveys as a tool to assess operations and understand inmate perceptions.*

The Sheriff's Office is a proponent of using surveys to identify strengths and weaknesses within its system. Since the time of this recommendation, it has commissioned and performed the following surveys:

- In 2018, the Sheriff's Office had GAR, Inc. perform a Climate Survey. The results of this survey were presented to the Board of Supervisors. The Sheriff's Office will be following up with a second Climate Survey that will be performed later this year.
- In 2021, the Sheriff's Office performed a Tablet Survey along with its tablet distribution.
- In 2021, The Moss Group performed an in-depth Gender Responsive Survey of the Women's Facility to assist in developing recommendations regarding individuals' needs specific to gender issues.
- In 2022, the Sheriff's Office performed a Grievance Survey. The results were presented to the Public Safety and Justice Committee in May of that year. This will be followed up in 2023 with a survey of men in its facilities. In 2023, The Moss Group performed a Women's Grievance Survey as a compliment to the men's survey.
- The Sheriff's Office is also in conversation with CHS about performing a survey of medical, mental health, and dental services in 2024.

*64: Create an Inmate Council which represents inmates in various buildings.*

*65: Allow inmates to form Committees and designate inmate leaders/representatives by Housing Units etc. The leader is voted in by peers and all leaders would come together for regular meetings by jail location to make real decisions and changes. Guidance should be given by staff for logistics and direction until they are fully established. The reports from these bodies should go to the newly established Santa Clara County Jail Diversion and Behavioral Health Subcommittee.*

*523: The Jail should establish an inmate committee to provide ongoing input regarding the grievance and complaint process and other issues.*

The Sheriff's Office created Inmate Advisory Councils in 2018. Members were elected from within each housing unit. The group is made up of elected representatives from the various housing units. This group met for three years until the start of COVID when it had to be disbanded due to the pandemic. The IAC was started again in 2023.

The IACs consist of elected representatives from the various housing units at both Main Jail and Elmwood. Jail administration creates an agenda that includes their report-back on issues raised at the previous meeting and other information they need to share with the representatives. Council members then present issues and concerns from their housing units with the administration, followed by an opportunity for discussion.

OCLEM attends these meetings and reports back to CCLEM about the various issues raised as well as the Sheriff's Office responsiveness. Minutes from all meetings are shared on the tablets and posted on the Sheriff's Office's website.

*110: A formal jail liaison should be designated by Behavioral Health and programs and local to improve communication and coordination between the jail and agencies involved in the discharge planning and pre and post adjudication services for offenders with mental illness.*

The Support Services Division of the Sheriff's Office, which includes the Classification Unit and the Programs Unit, works with stakeholders to improve the identification, housing and discharge planning of offenders with mental illness. The Support Services Division works closely with Custody Health Services, Behavioral Health Services, the Court, and the Office of Reentry Services to provide individuals with the appropriate services while in custody and works to line up provision of necessary wrap around services required as part of their discharge plan. The Support Services Division is a part of the Community Awaiting Placement Supervision (CAPS) Oversight Team and performs the transports of individuals on the CAPS list from the jail to the Office of Reentry upon their release from custody.

*165: Outside of the formal grievances process, create a venue for families, friends of detainees, and advocacy groups to present concerns related to the jails, conditions of confinement, or problems associated with incarceration within our county. Provide an opportunity for these concerns to be heard by a body that can mediate and respond, such as the Board of Supervisors, or Human Relations Commission. Seek examples of mediation and community building groups from other counties.*

The Board of Supervisors established CCLEM by Ordinance in 2020 to serve as a focal point for community engagement and provide a forum for consideration of community concerns, including issues surrounding the jails. CCLEM holds monthly public meetings that are posted to the County's website for public review.

*197: Create incentives for prosocial inmate behavior.*

In 2017, the Office of the Sheriff adopted a new Classification System that objectively assigns individuals to a security level based on their in-custody behavior with the goal of incentivizing good behavior. The system includes a reclassification tool that allows every individual the opportunity to have their file reviewed every 60 days for the possibility of being "down classed" to a lower security level. This is based directly on their documented in-custody behavior. Lower security level individuals are housed in less restrictive settings and have increased access to out-of-cell time and program opportunities.

*406: Circulate an RFP for a tablet device capable of allowing inmates to electronically file grievances, request forms, and request medical, psychiatric, and dental services.*

The Procurement Department and Sheriff's Office went through a competitive bid process to select a vendor to provide tablets. The tablets were rolled out in both jails between May and September 2021. They allow individuals to file grievances and requests electronically. Currently, however, this device doesn't allow for medical, psychiatric, or dental services because of restrictions related to privacy laws surrounding individuals' protected health information. The Sheriff's Office and Custody Health would like to find a way to allow medical services to be accessed via the tablet system, but this may require new technology that is not currently available.

Recommendation		OCLEM Finding
Summarized: JCE 3		
10	The Sheriff's Office should immediately place its Operations Manual for both Custody and Enforcement online so it is available to the public.	Completed
193	As new information systems and applications are adopted, the SCCS should ensure that there has been proper thought and analysis in the desired operation and management data through regular reporting.	Objective met

*10: The Sheriff's Office should immediately place its Operations Manual for both Custody and Enforcement online so it is available to the public.*

All of the policies for both the Custody Bureau and Enforcement Bureau are available on the Sheriff's Office website along with annual statistics and other information.

*193: As new information systems and applications are adopted, the SCCS [Santa Clara County Sheriff] should ensure that there has been proper thought and analysis in the desired operation and management data through regular reporting.*

The intent of this recommendation is not entirely clear, but to the extent the goal is to ensure thoughtful analysis and public transparency around any new technology or information systems acquisitions, we believe the Sheriff's Office meets this objective on a regular basis. The County's extensive requirements around development of Surveillance Use Policies and production of Annual Surveillance Reports relating to comprehensive lists of equipment and data systems is a good example of this analysis and transparency.

Recommendation		OCLEM Finding
Summarized: JCE 4		
192	Include staff in decision making when practical, especially when changes will affect the operational level of the organization.	Objective met

*192: Include staff in decision making when practical, especially when changes will affect the operational level of the organization.*

Staff at appropriate levels are included in decision making and implementation plans of operational changes. We have observed this inclusive team-based approach on a few levels. For example, with respect to our monitoring of use of force reporting, the Use of Force Review Committee, and the Grievance Unit, Custody leadership includes personnel from all ranks in meetings and discussions around next steps.

Recommendation		OCLEM Finding
Summarized: JCE 5		
173	Feminine products should be made available to women as needed.	Completed
319	Ensure adequate documentation and accessibility of DOC policies and procedures.	Completed
320	Establish effective shift change communication procedures and staffing levels.	Completed
525	The jail should abandon its practice of locking inmates down during visits by outside entities.	Sheriff's Office disagrees and implements lockdowns on a case-by-case basis. OCLEM concurs.
543	The Sheriff's Office should develop posters to highlight the risk involved in cleaning hazardous materials, including providing free gloves to individuals who chose to clean while they wait for hazardous materials staff to arrive. This information should also be included in the inmate handbook.	Recommendation lacks clarity and consistency. Warning about biohazardous material provided in rulebook.

*173: Feminine products should be made available to women as needed.*

Feminine products are now readily available and provided free of charge.

*319: Ensure adequate documentation and accessibility of DOC policies and procedures.*

As policies are completed, they are uploaded to the Sheriff's Office shared drive, which all deputies have access to. Further, all staff are advised of any new or amended policy via email, with a link to the policy.

*320: Establish effective shift change communication procedures and staffing levels.*

Since the time this recommendation was made, the Custody Bureau reinstated regular squad meetings prior to each shift. Also, deputies are trained on an established Shift Change Protocol that directs them to pass down information about inmate-specific behavior to the next shift of deputies coming on duty. Pass down information can be exchanged during squad meetings or between deputies working in a certain module as they exchange their posts.

*525: The jail should abandon its practice of locking inmates down during visits by outside entities.*

To the extent this recommendation suggests a blanket prohibition on locking individuals down during outside visits, the Sheriff's Office disagrees with this recommendation. The need to impose lockdowns is determined on a case-by-case basis. Facility administration takes into consideration the nature and classification of the individuals in the unit as well as the number of individuals visiting and the purpose of the visit to determine whether a lockdown is necessary. In general, it is not easy or convenient for the facility to go on lockdown, and it leads to other ramifications, so facilities try to limit these occurrences, balanced against the security of the jails. OCLEM is not in a position to question Custody leadership's assessment of the agency's security needs but will track this issue should it come up on a case-by-case basis to assess whether the jails are needlessly locking individuals down.

*543: The Sheriff's Office should develop posters to highlight the risk involved in cleaning hazardous materials, including providing free gloves to individuals who chose to clean while they wait for hazardous materials staff to arrive. This information should also be included in the inmate handbook.*

The intent of this recommendation is not entirely clear. If the goal is to highlight the risk, the Sheriff's Office should not be providing gloves, because that could be interpreted as encouraging individuals to engage in hazardous materials clean-up. It is more appropriate for the Sheriff's Office to keep incarcerated individuals away from hazardous materials. For example, the Inmate Orientation & Rulebook contains this warning, in bold print:

*Inmates are not required to clean up bodily fluids. If someone is sick, notify a Deputy to request a Biohazard Team to clean up the area. Bodily fluids can carry disease, including HIV/AIDS.*

Recommendation		OCLEM Finding
Summarized: UOF 3		
474	The supervisor completing the standard investigation and the approving watch commander will be required to attend to answer questions and justify their recommendations regarding the incident.	Completed
483	Increase transparency of the Use of Force Policy.	Completed
484	Publish finalized revised use of force policy to ensure the public has access to the standards and procedures for the use of force in custody facilities.	Completed

*474: The supervisor completing the standard investigation and the approving watch commander will be required to attend to answer questions and justify their recommendations regarding the incident.*

During an investigation into an event all relevant individuals, including supervisors and facility administrators, may be required to respond to questions or comply with investigators regarding incidents.

*483: Increase transparency of the Use of Force Policy.*

The finalized Use of Force Policy is available on the Sheriff’s Office website. Additionally, the Sheriff’s Office published an Annual Use of Force of Report and presents it to the Community Correction and Law Enforcement Monitoring Committee allowing the public the opportunity to ask questions regarding the policy and/or the report.

*484: Publish finalized revised use of force policy to ensure the public has access to the standards and procedures for the use of force in custody facilities.*

The finalized Use of Force Policy is available on the Sheriff’s Office website.



# Master List Recommendations: Outdated or Otherwise Not Applicable

We recommend that the following recommendations be removed from the list of those being audited, because they are either outdated, too vague to be effectively audited, their intent has been met through some other means, or they are no longer applicable for some other reason, as detailed in the following table.

Recommendation		Description	OCLEM Finding
Master List	Summarized List		
98	ISV 4	Report on the status of the Harvey M. Rose audit recommendations and set a date for completion of recommendations not yet implemented.	OCLEM consulted with the Harvey M. Rose auditor, who was not certain which set of audit recommendations this recommendation (#98) refers to but believes it may be a set of recommendations made in a 2018 audit (though the results were not published until 2021). This audit included 46 recommendations which, the auditor states, had to be developed with very little cooperation from the then-Sheriff. The 46 recommendations broadly cover subjects addressed in both the larger group of Master List Recommendations and the federal consent decrees (i.e., grievances, programming, internal affairs operations, and LGBTQI polices). Many of these 46 are quite specific to issues identified over six years ago and are no longer relevant. OCLEM finds that these recommendations are sufficiently outdated and duplicative that this item (#98) should be retired from the list of those actively monitored.

Recommendation		Description	OCLEM Finding
Master List	Summarized List		
577	HLC 6	From an operational perspective, unifying the intake process for male and female prisoners would open up a significant amount of physical plant space to provide for these options and it would greatly reduce the duplication of staff necessary to run two separate parallel tracks.	This is a statement and not a recommendation. To the degree that the statement suggests a different way of managing intake, unifying the intake process for male and female prisoners would have consequences not addressed by the statement that could outweigh any potential efficiencies.
43	GRV 1	Revise the Custody Input Report form.	Not sufficiently specific to audit as written. There is no detail about which aspects of the form should be revised. Further, both OCLEM and the federal monitors have access to and monitor the grievance system, so any specific need for revision of the form will be identified by those monitors.
488		The critical distinction between the two basic types of grievances should guide the Jail's approach at every stage, as well as the scope of independent oversight.	Not sufficiently specific to audit as written. It doesn't call out the two types of grievances, and the idea that the distinctions should serve as a guide provides no specific action item whose completion could be measured. The current grievance system has mechanisms for distinguishing between various types of grievances that dictate how they will be handled.

Recommendation		Description	OCLEM Finding
Master List	Summarized List		
490	GRV 4	Grievance procedures must be viewed as a means of oversight of inmates' rights and of jail and staff accountability.	Not sufficiently specific to audit as written. Grievance procedures are a critical component of protecting the rights of those in custody and are an important means of oversight. The extent to which they are viewed as such (or not) is not a specific action item whose completion can be measured. This Board's Public Safety and Justice Committee receives regular public reports on the grievance system and OCLEM intends to continue to monitor jail grievances.
382	GRV 5	Share collected data during squad meetings to identify areas of improvement.	Not sufficiently specific to audit as written. Information discussed during squad meetings is generally shared among personnel and with supervisors with the goal of improving operations.
491		The Jail should make complete and accurate information readily available and should routinely update such information.	Not sufficiently specific to audit as written. It is not clear to whom the information should be made available. Further, Custody Bureau now provides a quarterly report related to grievances to the PSJC that provides a significant amount of the detail related to various aspects of the grievance system.
344	HST 4	Ensure that the provision of staff training is appropriate, timely, and sufficient to meet staffing needs and to improve and maintain jail security and officer and inmate safety.	This is an overly broad statement that is not sufficiently specific to audit as it is written. There are other recommendations related to training that address this broad goal in a more concrete way.

Recommendation		Description	OCLEM Finding
Master List	Summarized List		
345		Staff training should promote the rehabilitation of inmates and contribute to reducing recidivism.	This is an accurate statement about training goals but is not sufficiently specific to audit. There are other recommendations related to training that address this broad goal in a more concrete way.
455		Implement the training module and ensure all custody staff completes the training module.	Not sufficiently specific to audit as written and unclear as to which training module the recommendation is directed. Many new training modules have been developed and implemented since the time this recommendation was prepared.
457		Ensure custody staff are equipped to manage inmates exhibiting or diagnosed with mental health issues.	Not sufficiently specific to audit as written. Custody staff are all provided with a variety of training to equip them with the skills to interact with individuals with behavioral health concerns. There are other recommendations related to training that address this broad goal in a more concrete way.
459		Implement training courses specific to identified needs of inmates to ensure that the needs of all inmates are understood and managed appropriately.	This is a broad statement about overall training goals that is not sufficiently specific to audit as it is written. There are other recommendations related to training that address this aspiration in more concrete ways.
463		To reinforce training on how to recognize mental illness and developmental disabilities, along with a directed focus on if, how and when to deploy de-escalation techniques and use of force.	This is a broad statement about overall training goals that is not sufficiently specific to audit as it is written. There are other recommendations related to training on mental health, de-escalation, and use of force that address this general goal in more concrete ways.

Recommendation		Description	OCLEM Finding
Master List	Summarized List		
198	JAF 4	Inventory and assess current equipment needs into sets of priorities so when resources become available purchases can be made quickly but wisely.	This is a goal for good management and fiscal responsibility, but is not sufficiently specific to be effectively audited.
362	JCE 1	To shift the organizational philosophy toward correctional best practices, including the manner in which correctional staff interacts with the changing inmate population.	This is a broad statement about organizational culture that is not sufficiently specific to audit. There are other recommendations related to correctional best practices and training for staff on their interactions with those in custody that address this goal in more concrete ways.
190	JCE 3	Use the data reports as organizational report cards and, moreover, use them to create conversations that reinforce desired trends or create strategies to address undesired trends.	Without further context about which data reports this recommendation refers to, it is not possible to audit. In general, using data to identify trends and inform an agency's strategies is good management practice.
361		Review and implement recommendations provided by the NIC. One of the major focuses of the NIC review is to examine organizational culture.	It is not clear which NIC recommendations this recommendation refers to. Custody Bureau personnel are not aware of any NIC review of Sheriff's Office organizational culture. It may refer more broadly to an NIC publication, but as written, this recommendation is not sufficiently specific to be audited.
194	JCE 4	They will also need training on effective coaching and appraisal skills, should the SCCS adopt a true performance appraisal system.	This recommendation is too vague to be effectively audited. It is not clear who it refers to, and is conditioned on adoption of an appraisal system that also is not clearly defined.

Recommendation		Description	OCLEM Finding
Master List	Summarized List		
318		Ensure that the supervision of staff is appropriate with clear and consistent policies and procedures that reflect Constitutional law, applicable regulations, and human rights standards. Ensure that staff incentives support this same culture and practices. Create well thought out, well written and reliable policy that guides employees. Help them understand the reason for the policy decisions to develop the culture of a learning organization.	This a broad statement of organizational values that encompasses a wide range of subjects: supervision, constitutional policing principles, disciplinary and commendation culture, policy, and training. Other, more specific recommendations address each of these areas in different ways, and provide a better, more concrete opportunity to ensure implementation and effective auditing.
162	JCE 5	Address delays in receiving and forwarding mail to the courts by assuring including grievance by prompt receipt and delivery.	This recommendation is not comprehensible as written. Custody Bureau will accept and process grievances relating to delays in receiving and forwarding legal correspondence.
185		Create well thought out, well written and reliable policy that guides employees. Help them understand the reason for the policy decisions to develop the culture of a learning organization.	This is a broad statement about policy development, training, and organizational culture that is not sufficiently specific to audit. There are other recommendations related to policy and training that address this goal in more concrete ways.

Recommendation		Description	OCLEM Finding
Master List	Summarized List		
515		The jail should prioritize addressing other areas of serious concern, including the overreliance on restrictive housing, crowding and conditions in Main Jail South, under-staffing and PREA compliance.	This is a broad statement that encompasses a number of specific and not necessarily related topics. Overreliance on restrictive housing is an ongoing concern that is addressed in the federal consent decrees. Main Jail South has been closed and demolished. Understaffing is a chronic concern that the Sheriff's Office addresses on an ongoing basis. PREA compliance issues are addressed in numerous other recommendations. Attempts to monitor or audit these issues in the context of this recommendation would be duplicative, ineffective and inefficient.
276	SUI 2	CCTV Monitoring - identifies a suicide attempt in progress.	This is a statement, not a concrete recommendation that can be effectively audited. The widespread installation of cameras is an attempt to detect/prevent attempted suicides as well as other concerning behavior.
603	OVR 6	Areas where change is identified should be scheduled for a follow-up study to ensure that the changes have actually occurred.	The principle of creating action items with mechanisms for holding people accountable to completing a task is an important aspect of management of any large organization. This recommendation, though, is overly broad and too vague to be audited.
326	STF 5	Ensure that officer recruitment, selection, retention, and progressive discipline are based on best practices, the SO's mission, and effective training.	This is a broad statement of goals that impacts several important functions of an agency's efforts to manage its personnel issues. But it addresses too many subjects in too broad a manner for it to be effectively audited.