



December 10, 2024

Guillermo Viera Rosa, Chief Probation Officer  
Los Angeles County Probation Department  
9150 Imperial Highway  
Downey CA 90242

**SUBJECT: UNREMEDIED NON-COMPLIANCE WITH TITLE 15 § 1321: STAFFING  
– LOS PADRINOS JUVENILE HALL, LOS ANGELES COUNTY PROBATION  
DEPARTMENT**

Dear Chief Viera Rosa:

I am writing to inform you that following reinspection of Los Padrinos Juvenile Hall (Los Padrinos) conducted on December 5 and 6, 2024, Los Padrinos remains out of compliance with Section 1321 of Title 15 of the California Code of Regulations. This inspection was conducted in response to your request for reinspection dated December 2, 2024. During our inspection, we found that effort has been made to address and mitigate the issues that led to noncompliance with Title 15, section 1321, Staffing; however, the county has failed to remedy the conditions that rendered the facility unsuitable.

**Scope of Reinspection**

During our inspection, we reviewed the following documentation from November 19-December 2, 2024:

- Facility Staffing Reports, Staffing Sheets and Updated Staffing Plan
- Program, Recreation and Exercise Logs
- School Movement Documentation Sheets/LACOE Movement Documents
- Medical Appointment Transportation Team (External)

*Facility Staffing Reports/Staffing Sheets/Updated Staffing Plan*

The facility continues to be minimally staffed; the county provided us with an updated staffing plan on December 4, 2024. This updated plan, similar to previous plans, does not provide background analysis of the staffing plan that takes into account how the minimum staffing numbers were determined. It appears the county has not undertaken a proper staffing analysis to adequately determine minimum staffing numbers; there is no analysis of posted positions, physical plant limitations, planning for contingencies, etc. The only information available is minimum numbers for staffing, and versions of a staffing plan that includes minimum/mandatory, baseline, program minimum, and operational minimums. The county continues to staff the facility at operational minimums, which negatively impacts the facility's ability to meet required minimum standards.

Since the last inspection, the county has implemented a population reduction plan and has made strides in reducing the number of youth being placed in the facility; however, there is no analysis that indicates that the staffing numbers should be commensurately decreased. In this latest staffing plan, however, the county has further decreased already low staffing minimums.

We found of the 45 shifts reviewed, (5) AM shifts and (6) EM shifts (24% of shifts overall) did not meet the Department's required minimum unit staffing requirements. We found Monday, Tuesday, and Saturday Early Morning shifts and Saturday, Sunday and Monday AM shifts to be below the identified minimum staffing numbers. There were 11 occurrences where youth identified as a Level youth did not have a Level staff assigned per the documentation provided; this highlights that minimum staffing numbers continue to not be met and/or are inadequate to meet the needs of the facility.

We found that the current staffing numbers do not allow for all required activities, operations, programs and facility functions, and to ensure the safety of youth and staff.

#### *Program, Recreation and Exercise Logs*

The findings of noncompliance with staffing are also linked to the inability of the facility to provide programs, recreation, and exercise in compliance with minimum standards due to the lack of staff. During our review of activity logs, we found two (2) instances where the lack of staff was specifically noted as the cause for the units to cancel outdoor exercise. We also found a significant number of documented occurrences of youth not being provided with the opportunity to go outside for exercise or for outdoor activity due to "darkness," despite the facility having lighted areas.

When we discovered documentation of modification of outdoor recreation to indoor recreation, we verified those activities on video review. What we observed was that in most cases, youth did not participate in exercise, but rather engaged in recreation activities in the dayroom, such as, TV, phones, video games etc.

#### *School Movement*

The finding of noncompliance with staffing was also based on the inability of facility staff to get youth to school on time due to lack of staff available for supervision within the classroom. While the facility has improved in this area, youth continue to be late to school, due to operational issues that occurred within the units, such as late medical rounds, restructuring of youth, or unit incidents that occurred. We also found a noteworthy number of late starts due to the teachers being late to the classroom, which were confirmed to be educators being late to the facility.

*Medical Appointment Transportation Team (External)*

To determine if issues with youth getting to medical appointments have been remedied, we met with the Juvenile Court Health Services AM and PM shift supervisors and Probation to determine the status of outside medical appointments and to discuss process. While both healthcare supervisors noted an improvement in getting youth to appointments, there continues to be cancellations as need exceeds the resources allocated/available for getting youth to appointments.

*Conclusion*

Based on the foregoing, our reinspection findings indicate that the Los Angeles County Probation Department has not remedied the noncompliance with Section 1321 (Staffing) at the Los Padrinos Juvenile Hall.

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If you have any questions, please contact Field Representative Lisa Southwell at [lisa.southwell@bscc.ca.gov](mailto:lisa.southwell@bscc.ca.gov) or (916) 322-1638.

Sincerely,



LISA SOUTHWELL  
Field Representative  
Facilities Standards and Operations Division

Cc:

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Honorable Samantha P. Jessner, Presiding Judge, Los Angeles County Superior Court  
Honorable Akemi Arakaki, Presiding Judge of the Juvenile Court  
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