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8	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
9	COUNTY OF LOS ANGELES		
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12	THE PEOPLE OF THE STATE OF CALIFORNIA, EX. REL. XAVIER	Case No. 21STCV01309	
13	BECERRA, ATTORNEY GENERAL OF THE STATE OF CALIFORNIA, ¹		
14	Plaintiff,	[PROPOSED] ORDER AMENDING STIPULATED JUDGMENT	
15	v.	STIT CENTED GOD GIVE IVI	
16	v.	Date: November 21, 2024 Time: 8:30 a.m.	
17	LOS ANGELES COUNTY; AND LOS	Dept: 34	
18	ANGELES COUNTY OFFICE OF EDUCATION,	Judge: Hon. Peter A. Hernandez	
19			
20	Defendants.		
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28	The comment Attended Comment of the Co	to of California is Dah Danta	
۷۵	¹ The current Attorney General of the State of California is Rob Bonta.		

Having considered the Ex Parte Application for Entry of [Proposed] Order Amending Stipulated Judgment of January 21, 2021 (the Judgment) brought by Plaintiff, the People of the State of California, and Defendant, the County of Los Angles, and other papers on file in this matter, the Court grants the motion as follows.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

I. Introduction

- 1. This Order is entered pursuant to the Court's continuing jurisdiction under Judgment paragraph 68 and Code of Civil Procedure section 664.6, and pursuant to Judgment paragraph 65, which provides that that "[t]he Attorney General and the County may jointly agree to make changes, modifications, and amendments to the Judgment in writing, and changes the Parties deem to be material revisions will be effective after a joint motion is filed by the Parties with the Court." (See Stipulated Judgment for Defendant County of Los Angeles (Jan. 21, 2021).)
- 2. All the provisions of the Judgment remain in full force and effect, except that Judgment paragraphs 35, 36, 45, 53, 54, 55, 56, 58, and 59 are amended as described in paragraphs 5 through 13 of this order.
- 3. The provisions of this Order are in addition to the County's existing obligations under the Judgment, the Detailed Plan incorporated by reference into the Judgment, and the Stipulated Additional Judgment Terms to Address Noncompliance that the Court approved on November 13, 2023 ("First Amendment"). The provisions of this Order are incorporated into the Judgment and are subject to sections XVI, XVII, XVIII, XIX, XX, XXI, XXII, XXIII, and XXIV of the Judgment. The definitions contained in paragraph 8 of the Judgment and in the preamble to the Detailed Plan also apply to this Order.
- 4. As used in this Order, "Los Padrinos Juvenile Hall" includes Los Padrinos Juvenile Hall and any successors or assigns of Los Padrinos Juvenile Hall, including any successor or assign facility or facilities as defined in paragraph 8(l) of the Judgment.

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5. The effective date of this Order is the date that the joint stipulation is signed by the parties.

II. AMENDMENTS TO JUDGMENT PARAGRAPHS 35, 36, 45, 53, 54, 55, 56, 58, AND 59

- 6. Judgment Paragraph 35 is amended such that it now provides, in its entirety, as follows: "This Judgment will be overseen by a Monitor who will be provided timely access to information and documents to ensure compliance with this Judgment and whose reasonable costs and expenses, as set forth in Paragraph 37, will be paid by the County. The Monitor will oversee conditions of confinement, as well as compliance with and implementation of this Judgment and any subsequent Amendments. The Monitor will be assisted by at least three Subject Matter Experts (SME) who will evaluate provisions related to their expertise and advise the Monitor. The first SME will be an expert in behavioral health services (hereinafter, Behavioral Health SME). The second SME will be an expert in medical access (hereinafter, Medical Access SME). The third will be an expert in education, educational transition and after-care services, and career technical and post-secondary education programming in the juvenile hall context (hereinafter, Education SME). The Monitor will be Michael Dempsey. Effective September 1, 2024, the Behavioral Health SME will be Dr. Monique Khumalo. Effective September 1, 2024, the Medical Access SME will be Dr. Khandra Tyler-Beynum. The Education SME will be Dr. Peter Leone. The Monitor, in consultation with the appropriate SME, will review and approve the policies, procedures, and protocols specified in the substantive provisions of this Judgment and the Detailed Plan."
- 7. Judgment Paragraph 36 is amended such that it now provides, in its entirety, as follows: "The Monitor, Behavioral Health SME, and Medical Access SME will be selected by mutual agreement of the Parties. The Education SME will be selected by mutual agreement of the Parties and LACOE.
- 8. Judgment Paragraph 45 is amended such that it now provides, in its entirety, as follows: "The Monitor will provide reports on the status of compliance with the

Judgment on at least a semi-annual basis until termination of the Judgment. The reports will include a finding of Substantial Compliance, Partial Compliance, or Non-Compliance on each substantive provision of this Judgment, Detailed Plan task, and First and Second Amendments to the Judgment, to the extent these provisions remain subject to reporting under Judgment paragraph 56. For any provision or task with a finding other than Substantial Compliance, the Monitor, after consultation with the County, will provide detailed written direction, consistent with the Judgment, Detailed Plan, and any Amendments to the County to achieve Substantial Compliance. At least 60 days before the anticipated filing of each report, the Monitor will provide the Parties with a draft copy and a reasonable opportunity to respond within 30 days. To the extent the County believes that any information in the report is confidential, the County may provide the Monitor and the Attorney General with information about the specific language that it believes should be redacted in the final report along with its response above. For purposes of this paragraph, confidential information is information that would disclose the identity of a youth. The Monitor will consider the Parties' responses and make appropriate changes before submitting a final report to the Parties. The Attorney General shall file the Monitor's reports with the County's redactions under this paragraph with this Court but will not file the document under seal. If the Court requests or orders the Parties to file an unredacted report, the Attorney General shall do so on behalf of the Parties. For any provision or task within the Detailed Plan that received a finding other than Substantial Compliance, the Monitor may in his discretion require that the County provide the Monitor, within 60 days of the Monitor's request or at such other later time as the Monitor deems appropriate, a Corrective Action Plan for Monitor review and approval for any such provision or task, addressing the County's plans to come into Substantial Compliance, including a timeline, and incorporating or otherwise addressing any applicable direction the Monitor provided in his report."

- 9. Judgment Paragraph 53 is amended such that it now provides, in its entirety, as follows: "The Behavioral Health SME will have access to observe or review individual behavioral health treatment sessions, and the Medical Access SME will have access to observe and review health treatment sessions, that directly relate to the County's implementation of and compliance with this Judgment, only with the express permission of the youth and/or the youth's parent or guardian as required by law."
- 10. Judgment **Paragraph 54** is amended such that it now provides, in its entirety, as follows: "The Behavioral Health SME, a licensed mental health professional, will be permitted, with reasonable notice in advance, to observe group facilitation and therapy sessions for the purpose of advising DMH staff and providing technical assistance and direction."
- 11. Judgment **Paragraph 55** is amended such that it now provides, in its entirety, as follows: "The Medical Access SME will have access to only de-identified medical records, and the Behavioral Health SME will have access only to de-identified behavioral health records, for purposes of assessing compliance with this Judgment, unless there is a particularized need related to an individual youth."
- 12. Judgment Paragraph 56 is amended such that it now provides, in its entirety, as follows: "Upon the Monitor's conclusion that the County has achieved and maintained Substantial Compliance with any substantive provision(s) and/or individual task from the Detailed Plan for a period of 12 consecutive months ("Compliance Period"), that provision or task will be deemed completed and the Monitor will no longer assess or report on that provision, and the County will no longer be required to provide compliance or proof of practice documentation after a provision or task is no longer being assessed. Where the Monitor concludes that the County has achieved and maintained Substantial Compliance for the entirety of the Compliance Period with a substantive provision or task of the Judgment or the Amendments, as described immediately above, at one facility but not another, the Monitor will no longer assess

or report on that provision or task for the Juvenile Hall where Substantial Compliance has been achieved."

- 13. Judgment **Paragraph 58** is amended such that it now provides, in its entirety, as follows: "If a Party objects to the Monitor's determination as to whether the County has achieved and maintained Substantial Compliance as set forth in Paragraph 56, the objecting party shall provide its rationale for that objection in writing to the other Party and the Monitor. If the Monitor does not agree with the objection, the Parties and the Monitor shall engage in the dispute resolution process described in Section XVI of the Judgment."
- 14. Judgment **Paragraph 59** is amended such that it now provides, in its entirety, as follows: "This Judgment and the Court's jurisdiction will automatically terminate once all substantive provisions of the Judgment have been deemed complete as set forth in paragraphs 56 and 57. The Attorney General will file a joint order to terminate jurisdiction within 10 business days of the automatic termination."

III. COMPOSITION AND AUTHORITY OF MONITORING TEAM

- 15. The Monitor shall continue to issue monthly reports to the Parties as to compliance with the First Amendment until the County reaches Substantial Compliance with those provisions and their corresponding Detailed Plan tasks. The County shall be required to consider any written guidance contained in the monthly reports to remedy the County's noncompliance or partial compliance with those provisions or their corresponding Detailed Plan tasks, and incorporate or otherwise address such guidance in any Corrective Action Plan the County submits in response to the Monitor's semi-annual reports pursuant to Judgment paragraph 45, as amended above, for the Monitor's review and approval.
- 16. The County shall continue to work with the Data SME to develop data systems that will effectively support the County's compliance efforts and operations, including adopting the Guard1 system or an equivalent system for tracking data related to paragraph 24(c) of the Judgment by December 31, 2024, and working on the

development of monthly reports containing data sufficient to assess the County's compliance with the Judgment, consistent with the requirements of and compliance measures set forth in the Detailed Plan and Amendments, and as directed by the Monitor.

17. If, by June 30, 2025, the County has not achieved Substantial Compliance with the Judgment provisions and corresponding Detailed Plan Tasks identified in the Probation Department DOJ Compliance Action Plan attached hereto as Exhibit A, the monitoring team shall—without further order of this Court—expand to include one Deputy Monitor for Los Padrinos Juvenile Hall. The parties will meet to discuss whether a Deputy Monitor is necessary for Barry J. Nidorf Secure Youth Treatment Facility prior to June 30, 2025. The Monitor will make final decision whether a Deputy Monitor is necessary for Barry J. Nidorf Secure Youth Treatment Facility. The Deputy Monitors shall be selected by the Monitor subject to mutual agreement of the Parties and will report directly to the Monitor. If practicable, the Deputy Monitors shall reside in the Los Angeles area and, if they do not, the County will not be obligated to pay for their lodging expenses. The hourly rate of the Deputy Monitors will not exceed the rate paid by the County to the Monitor. The Deputy Monitors shall have a collaborative relationship and ongoing communication with facility superintendents and the Compliance Team Lead, and shall engage in daily check-ins and joint problem-solving to address identified issues with facility leadership. The Deputy Monitors shall be on site no less than four days per week, at varying hours of the day so that they can see the operations of different shifts, and shall provide direct reports weekly to the Monitor and the County. The County shall be provided the Deputy Monitors' weekly schedule at least one week in advance. The County is not responsible for providing any equipment or electronics to the Deputy Monitors. The parties agree that the Deputy Monitors will be onsite for six months and, during that time, will focus on the County's compliance with the Detailed Compliance Action Plan elements and any other Judgment provisions or Detailed Action Plan tasks the

Monitor deems necessary. Due to the expected cost to the County, after six months, the Monitor will re-assess, with input from the parties, whether continued use of the Deputy Monitors is necessary and/or helpful. The Monitor's determination is final.

IV. USE OF FORCE AND YOUTH SAFETY

- 18. By January 30, 2025, the County shall review and amend all relevant policies to address excessive force and youth-on-youth violence either instigated or tolerated by staff and provide such revised policies to the Monitor for review and approval. The County's review will consider whether existing policies contain appropriate protocols to expeditiously investigate allegations of such misconduct and place staff on leave during such investigation, and appropriately provide that any staff found to be involved in such an incident shall be subject to discipline up to and including discharge, shall be reported to child abuse and outside law enforcement agencies as required by law, including the Child Abuse and Neglect Reporting Act, Penal Code section 11164 et seq., and that Probation shall consider referral for prosecution.
 - a. On August 12, 2024, the Attorney General's office provided revisions to
 DSB 609/SYTF 609 (Reduction of Youth-On-Youth Violence (YOYV)),
 DSB 1000/SYTF 1000 (Physical Interventions), DSB 1500/SYTF 1500
 (Prison Rape Elimination Act), DSB 1917/SYTF 1917 (Child Abuse
 Reporting), DSB 2341/SYTF 2431 (Staff Investigations), and the
 Supplemental Disciplinary Guidelines to implement paragraph 15. The
 County shall consider these proposed revisions when conducting its review.
 - b. The County's Office of Inspector General (OIG) will report to the Monitor, on a monthly basis, the number of new Internal Affairs referrals, number of open cases, and aggregate data on investigation outcome.
 - c. Substantial Compliance requires: (i) email distribution list shows that 98% of staff were sent notice of any revised policies by November 30, 2024; (ii)
 Monitor approval of training, including a training schedule, on revised

- policies; (iii) Monitor verification that the County is implementing the approved policies; and (iv) monthly reporting to the Monitor.
- 19. The County has provided the Monitor the plan for camera installation at Los Padrinos Juvenile Hall, and the Monitor previously approved it. The Monitor shall again review the plan and provide the County with any comments he has regarding camera coverage, as reflected in this plan, by no later than November 20, 2024. The County will consider any comments the Monitor has provided, and revise the installation plan as appropriate. Once the plan has been implemented and cameras installed, the Monitor may conduct an in-person "blind-spot" analysis of Los Padrinos Juvenile Hall to determine whether video camera coverage is not available in certain locations, including youth cells and the medical unit, and provide his findings to the County within two weeks thereafter. The County shall consider the Monitor's comments, discuss any concerns and requests for revision with the Monitor, and add additional cameras per the Monitor's final direction.
- 20. The County has previously provided the Monitor a CCTV Review Protocol. By December 30, 2024, the County shall provide the Monitor a finalized CCTV Review Protocol for Monitor review and approval. The County shall implement the protocol and take steps to ensure sufficient staff is assigned and appropriately trained to conduct this review.
 - a. OIG will select two random days a month to audit compliance with Probation's CCTV Review Protocol. The audit shall include review of the random days' paperwork and video footage, and assessment of whether footage has been tampered with and whether incidents that may violate the law, Judgment, and/or policy have been properly identified and elevated.
 - Substantial Compliance requires OIG verification to the Monitor, on a
 monthly basis, that the County is compliant with the protocol. Systemic
 findings and recommendations from OIG's reports to the Monitor under this

paragraph will be included, as appropriate, in OIG's existing reports required by the Judgment.

- 21. By October 31, 2024, the County will create a stand-alone "anti-retaliation" policy and provide to the Monitor for review and approval. By November 15, 2024, the Monitor will provide any feedback. By January 1, 2025, the County will issue the anti-retaliation policy. The policy shall be aligned with best practice and the County shall consider, at a minimum, requirements that all staff who are under investigation for credible allegations of abusive or unlawful conduct be immediately removed from the facility pending the outcome of the investigation and interim protections for youth that include ensuring that youth have no contact with such staff are implemented. The County also shall consider the Attorney General's office comments provided on DSB 1000/SYTF 1000 (Physical Interventions), DSB 1500/SYTF 1500 (Prison Rape Elimination Act), DSB 1706/SYTF 1706 (Ombudsman), and DSB 1917/SYTF 1917 (Child Abuse Reporting) in drafting its anti-retaliation policy.
 - a. Substantial Compliance requires: (i) email distribution list shows that 98% of staff were sent the stand-alone anti-retaliation policy within 10 days of issuance of the policy; and (ii) Monitor approval of training, including a training schedule, on the policy.
- 22. By November 15, 2024, the County shall employ at each facility under this Judgment an onsite Ombuds staff person from Probation's Office of the Ombudsman. The Office of the Ombudsperson shall report to Probation executives independently from the operational chain of command. The County shall provide the Monitor by November 15, 2024, the duties and responsibilities of the onsite Ombuds staff person(s) for the Monitor's review and approval.
 - a. The County has confirmed that the Ombuds staff persons will attend the United States Ombudsperson Association's New Ombudsman Training on November 18-22, 2024.

- A Senior Probation Director shall assume the duties of the Bureau Chief as described in Judgment paragraph 18.
- c. Substantial Compliance requires: (i) Monitor confirmation that approved individuals have been hired; (ii) Monitor approval of job duties; (iii) Monitor confirmation that the Ombuds staff persons have received the necessary training; (iv) Monitor approval of an infographic with information about the Ombuds staff persons, including all contact information, and it is posted in each Unit and in the orientation and intake area; (v) information regarding and contact information for the Ombuds staff persons is included in the youth handbook; and (vi) verification that the onsite Ombuds staff person is present and appropriately performing their duties during three consecutive separate in-person visits to the facilities.
- 23. By October 31, 2024, for Monitor review and approval, the County shall revise its Juvenile Hall DSB 700 Searches policy regarding room searches to set forth requirements to ensure that youths' belongings that are not contraband or otherwise inconsistent with County policy are maintained in a secure bag marked with the youth's name, not destroyed or removed from the Juvenile Halls, and returned to the youth upon release. The County shall continue to require that all searches of youths' persons or belongings, regardless of the individual or team conducting the search, comply with the County's Juvenile Hall policies, procedures, and directives pertaining to searches of youths' persons and belongings and with the law.
- 24. All staff assigned to supervise youth at Los Padrinos Juvenile Hall and Barry J. Nidorf Secure Youth Treatment Facility, including any Special Enforcement Operations (SEO) staff, shall have completed Juvenile Corrections Officers Core (JCOC) course as required under Penal Code Section 6035 and Title 15 section 1322. The JCOC Course is approved by the State and includes searches. The County will ensure any SEO staff working or providing support in the facilities will have the JCOC course training which includes searches prior to working inside the facilities. All staff

- assigned to search youth in the Juvenile Halls shall be required to annually review and follow the County's Juvenile Hall policy DSB 700 Searches, which pertains to searches of youths' belongings and persons.
- 25. OIG will review compliance with Probation's search policy in the Juvenile Halls, including by conducting a random review of a representative sample of searches and assessing whether searches were conducted within policy and consistent with law and were fully and accurately documented. OIG will report its findings to the Monitor and include them, as appropriate, in OIG's existing reports required by the Judgment during the term of this Judgment.
 - a. Substantial Compliance requires OIG determines that 90% of searches reviewed are in compliance with policy and law.
- 26. By November 30, 2024, the County shall hire and maintain any additional outside contractors necessary to supplement those required by paragraph 10 of the First Amendment. Any new outside contractors shall be reviewed and approved by the Monitor, receive the Monitor-approved training, and be employed until such time as the County can demonstrate to the Monitor that it has adequate staff with appropriate training and expertise to conduct the initial review and staff its Internal Affairs unit. The parties have agreed that backlogged use of force incidents need not be subject to secondary review by attorneys.
 - a. By October 15, 2024, the County will submit to the Monitor the County's
 Chief Executive Officer's analysis for the creation of new Internal Affairs
 (IA) classification for the Probation Department.
 - b. Substantial Compliance requires: 100% of the backlog is eliminated by December 15, 2024.
- 27. By November 15, 2024, the County shall provide to the Monitor for review and approval a plan for ensuring that all use-of-force incidents are timely reviewed and appropriately investigated, such that backlogs of un-reviewed incidents do not continue to accumulate. The County will identify any staff (a) still employed as of

October 9, 2024, and (b) involved in a use of force policy violation incident between 2022 through the present, which was (c) referred to IA by first level reviewers or an independent committee; and (d) yet declined by IA for review. All such incidents shall be re-referred to IA and IA shall review. Any future incidents involving the same staff will be assessed by the FIRST Team for patterns or repeat behaviors that require corrective or disciplinary action.

- a. Upon the Monitor's approval, the County shall implement the plan within 30 days. Until such time as the Monitor confirms that the plan is fully implemented and the backlog is eliminated, the requirements of Paragraph 25 remain in effect.
- b. Substantial Compliance requires: (i) Monitor approval of the plan; (ii) Monitor verification that the County is implementing the plan; (iii) 90% of use of force cases will be reviewed to determine if an Internal Affairs referral is necessary within 90 days unless good cause exists for an extension of time; and (iv) monthly reporting by the County to the Monitor on the number of Juvenile Hall use-of-force incident investigations.
- 28. The County has provided the Monitor for a plan, including a training video, for training staff on the use of the temporary cold-water decontamination showers described in paragraph 8 of the First Amendment. The Monitor has reviewed and approved the plan and the training video. The Compliance Team shall conduct monthly compliance checks to assess whether the temporary cold-water decontamination showers are charged, whether staff have been properly decontaminating youth for all O.C. spray incidents. As of September 27, 2024, the County has installed eye wash stations in the sinks in each unit at Los Padrinos. The County will continue to explore all humane alternative decontamination avenues pending the completion of cold water shower installation. The County shall verify alternative decontamination avenues with the Monitor prior to usage.

- a. Substantial Compliance requires monthly audits by the Compliance Team provided to the Monitor, and Monitor verification that youth are timely and properly decontaminated in at least 93% of instances in which youth are exposed to OC spray.
- 29. By November 15, 2025, the County shall complete the installation of functioning cold-water decontamination showers in all living units of the Juvenile Halls.
- 30. By December 13, 2024, the County will provide an enhanced CIT² team plan, which shall include all of the elements required by Paragraphs 17 and 20 of the First Amendment and mechanisms for increasing the use of the CIT team to reduce incidents of violence.
 - a. Substantial Compliance requires: (i) Monitor approval of the plan; (ii) Monitor verification that the County is implementing the approved enhanced CIT team plan; and (iii) Monitor review of random sample of use of force incidents demonstrates that in 90% of instances in which the CIT team was not employed, there was not sufficient time for the CIT team to be called to prevent escalation of the incident.
- 31. By November 30, 2024, the County shall develop and issue a post order documenting enhanced security at Juvenile Hall entries, including use of canines, pat-downs where probable cause exists, use of security specialists to conduct entry searches, and consideration of the implementation of low-radiation body scanners, and a timeline for implementation of enhanced security measures.
 - a. The County shall submit its proposed post order to the Monitor for review and approval by November 30, 2024.
 - b. Upon the Monitor's approval, the County shall issue the post order within one business day.

² The First Amendment provide for the creation and implementation of a "CARE team." The County, with Monitor approval, has renamed the CARE team the "Critical Incident Team" or "CIT."

c. Substantial Compliance requires: (i) Monitor approval of the post order and any updates the County makes to it thereafter; (ii) email distribution list shows that 98% of current staff were sent notice of the post order by December 20, 2024; and (iii) Monitor verification that the County is implementing the post order.

V. JOINT MEDICAL TRANSPORTATION PLAN

- 32. By November 30, 2024, the County shall provide to the Monitor for review and approval a revised draft of the Joint Medical Transport Plans for Barry J. Nidorf Secure Youth Treatment Facility and Los Padrinos Juvenile Hall required under paragraph 6 of the First Amendment. As required by paragraph 6 of the First Amendment, the Joint Medical Transport Plans shall be developed jointly by the heads of the Probation Department, the Department of Mental Health, and Juvenile Correctional Health Services, shall be in writing, and shall incorporate a quality-assurance review process and weekly collection and review of data in a form that shall also be provided to the Monitor, the Behavioral Health SME, and the Medical Access SME on a biweekly basis.
- 33. The County acknowledges that it remains out of compliance with paragraph 6 of the First Amendment, which required the implementation of Joint Medical Transportation Plans. If the County fails to provide the Monitor with its revised proposed Joint Medical Transport Plans by November 30, 2024, or if the Monitor determines that the County has failed to implement the Joint Medical Transport Plans within 30 days of approval, the County shall deposit \$100 into an interest-bearing account for each additional day that it fails to provide the Monitor with its proposed Joint Medical Transport Plans or fails to implement the approved proposed Joint Medical Transport Plans.
 - a. Upon the Monitor's approval, the County shall fully implement the Joint Medical Transport Plans within 30 days.

- b. Substantial Compliance requires: (i) Monitor approval of the Joint Medical Transport Plans; (ii) Monitor verification that the Joint Medical Transport Plans are being implemented; (iii) biweekly data provided by the County to the Monitor, the Behavioral Health SME, and the Medical Access SME; and (iv) Monitor finds that sufficiently reliable data provided by the County establish that youth receive timely medical services 93% of the time.
- c. Any money deposited shall be used for youth focused incentives or wellness items for youth housed at Los Padrinos Juvenile Hall with a plan approved by the Monitor.

VI. STAFFING

- 34. By January 30, 2025, the County shall provide an updated plan to the Monitor for review and approval, which shall address staff recruitment and retention, staff wellness, minimum staffing levels and regular adjustment of such levels to ensure it is balanced and adequate for actual daily population consistent with the staffing relief plan attached hereto as Exhibit B, and a plan for addressing callouts and other abusive leave practices. The County shall also provide, for review and approval by the Monitor, daily staffing data sheets that include the number of staff assigned to each unit, the number of youth on each unit, the minimum mandatory and full staffing numbers for each unit, and the number of call-outs, no-call no-shows, and staff on light duty. Upon the Monitor's approval of the form of the daily data sheets, the County shall provide the daily staffing data sheets on a weekly basis to the Monitor and to the Attorney General's office.
 - a. Substantial Compliance requires: (i) Monitor approval of the updated plan, the updated recruitment materials to reflect youth rehabilitation focus, and the daily staffing data sheet; (ii) Monitor verification that the County is implementing the updated plan; (iii) continued monthly reporting to the Monitor on staffing, including but not limited to: (a) call outs; (b) number of staff on light duty; (c) (d) number of staff resigning or terminated; (e)