Los Angeles Police Commission

Employment Litigation Audit Follow-Up Report

Conducted by the

Office of the Inspector General

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I. INTRODUCTION

The Office of the Inspector General (OIG) evaluated the Department’s efforts to come into compliance with the Board of Police Commissioners’ (BOPC) directives related to the OIG’s Employment Litigation Audit in 2013. These BOPC directives were designed to improve the Department’s assessment and evaluation of workplace-related matters that can create financial liability for the City of Los Angeles. Specifically, this report evaluates the Department’s compliance with the following seven BOPC directives: (1) The Department is to review and comply with Executive Directive No. 9; (2) the Workplace Mediation Program should be considered to resolve issues before the litigation stage; (3) the Department shall implement formal case reviews; (4) a document retention plan will be developed; (5) the Department will ensure that case information is timely and accurately entered into Claims and Lawsuit Information System (CLIS); (6) all employment-related complaints will be evaluated to identify areas of improvement and targeted training; and (7) adverse settlements and verdicts will be reviewed for lessons learned and training will be developed accordingly.

II. BACKGROUND

In June 2013, the OIG published an audit of the Department’s employment-related litigation. The OIG found that from Fiscal Year 2006/2007 to 2011/2012 a total of 99 employment-related lawsuits were closed. The awards or settlements, paid for by the City of Los Angeles, for those 99 closed cases totaled approximately $31,378,157, with an additional $42,686,258 in litigation costs, for a grand total of $74,064,415.1 The Audit was presented to, and adopted by, the BOPC on July 2, 2013.2

The Audit further revealed a number of deficiencies in the communication between, and in the record-keeping of both, the Los Angeles Office of the City Attorney (OCA) and the Department. A sample of 27 employment-related cases was selected for review; however, the OIG was unable to retrieve the files prior to the completion of the Audit.3 As a result, the Audit was inconclusive with regard to the Department’s compliance with Executive Directive No. 9 and could not fully evaluate the accuracy of the Department’s database for litigation, the Claims and Lawsuit Information System (CLIS).4

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1 OIG Employment Litigation Audit, page 5.
2 BPC #13-0235.
3 OIG Employment Litigation Audit, page 3.
4 Former Mayor Antonio Villaraigosa issued Executive Directive No. 9 on January 10, 2007, compelling the City’s departments to follow a list of strategies and practices in an effort to reduce the number of lawsuits filed against the City of Los Angeles.
The OIG was able to ascertain that in comparison to similar fields in the OCA’s litigation database, fields in CLIS were often left incomplete. The Audit found that information for the same cases was inconsistently entered into the two databases. For example, different entries for the same cases were noted in categories reflecting the claim/lawsuit status, key dates, and payout amounts. Auditors also found that managers were not properly trained on lessons learned from negative case outcomes nor did they receive training on how to better handle reoccurring employment issues.

As of March 2014, the OIG began communicating with the Department regarding the Audit and its recommendations. The Department has indicated that employment-related litigation is currently among the Department’s highest priorities.

III. BRIEF CONCLUSION

In the last year, the Department has begun to implement changes in the handling of employment-related issues and litigation, many of which were outlined in a status report provided to the OIG. This report detailed a variety of planned improvements with potential to substantially satisfy the BOPC mandates. Among other strategies, the Department will convene committees to discuss case-specific litigation decisions and risk management issues, upgrade CLIS, and will reform Legal Affairs Division (LAD) through a series of modifications to the current policies and practices.

IV. SUMMARY OF FINDINGS

Underlying many of the Audit’s findings and recommendations was a need for the Department to institute policies and practices that will encourage a comprehensive analysis of employment-related litigation for the purpose of establishing preventative measures and best practices going forward. To this end, the Audit specifically recommended that the Department come into compliance with the requirements of Executive Directive No. 9 and that in-depth case reviews of pending and completed litigation be conducted. With proper execution, case reviews – especially that of cases with adverse outcomes – should result in identification of problematic practices and policies for which proper training can be developed. The obvious intention is to refrain from repeating mistakes and/or behaviors that typically result in judgments adverse to the City.

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5 The OCA litigation database is Computer Law Systems, or “CLS,” and is operated completely separate from CLIS. The OCA does not have access to CLIS and the Department does not have access to CLS.
6 OIG Employment Litigation Audit, page 4.
7 OIG Employment Litigation Audit, page 4
8 OIG Employment Litigation Audit, page 8.
10 OIG Employment Litigation Audit Recommendations #1, #3, #6, and #7.
A. Litigation Coordination and Liability Management Committees

In response to many of the Audit recommendations, the Department created two committees: the Litigation Coordination Committee (LCC) and the Liability Management Committee (LMC). The LCC will be focused on litigation decision-making and the LMC will address risk management issues arising out of each case or from circumstances that may lead to litigation. Though larger policy issues may be revealed in these discussions, this will not be a primary function of either committee. The meetings are currently convened on an as-needed basis and have occurred several times each month since March 2014.

The list of attendees to the LCC will include the Special Assistant for Constitutional Policing (SACP), the investigating officers from LAD and representatives from the OCA, or private defense counsel who represent the City, the Office of Administrative Services (OAS), the Office of the Chief of Staff (OCOS), and the Office of Operations (OO). For each pending case, the LCC review will encompass the mandates of Executive Directive No. 9, including the following:

- Discussion on the results of an early, but thorough, review of the facts of the case, as well as the possibility of early mediation or settlement, within 90 days of the Department’s notice of the claim or litigation.\(^{11}\)
- Discussions about changes in policy or practice; any need for training, discipline, or reassignment; or potential changes in the law for pending litigation, within 105 days of the Department’s notice of the claim or litigation, periodically during the course of the case, and within 30 days following the conclusion of the litigation.\(^{12}\)
- Discussions between LAD’s Commanding Officer and the assigned defense counsel regarding the possibility of a statutory offer of settlement at least six months before any trial date.\(^{13}\)
- Discussions between LAD’s Commanding Officer and the assigned defense counsel regarding the possibility of appealing an adverse outcome within two weeks of the judgment, or at least two weeks before any appeals deadlines.\(^{14}\)

In comparison to the LCC, the LMC attendees will vary from meeting to meeting depending on the bureau(s) involved in the case(s) being reviewed. According to the Department, a core group will be present at each meeting, which should include representatives from the Employee Relations Group (ERG), Internal Affairs Group (IAG), LAD, OAS, OCA,

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\(^{11}\) Executive Directive No. 9, page 3, paragraph (3); page 4, paragraph (1).

\(^{12}\) Executive Directive No. 9, page 4, paragraph (2); page 5, paragraph (7).

\(^{13}\) Executive Directive No. 9, page 3, paragraph (4).

\(^{14}\) Executive Directive No. 9, page 4, paragraph (7).
OO, Personnel Division, Personnel Group, SACP, and the Workplace Investigation Section (WIS), in order to focus on risk management issues within pending litigation and that arise out of circumstances that may lead to litigation.\(^\text{15}\)

The OIG attended the two most recent LMC meetings on September 3 and October 1, 2014. It is clear that the process of formalizing the meetings is ongoing and that the Department is making progress in terms of the structure and organization of the committee discussions. Prior to the October 1 gathering, an agenda detailing the cases and subjects to be discussed was distributed to those who were expected to attend. All necessary personnel did, in fact, attend the October 1 meeting, resulting in a productive conversation about the issues at hand in each case. As the meetings continue to evolve, the OIG looks forward to this constructive review and analysis of current cases developing into training focused on employment-related and workplace behavior issues.

The organization of the LCC is also ongoing. The Department’s contact and communication with the OCA is much improved in the last seven months, including increased dialogue with the OCA’s Employment Litigation Section as of June 2014. The OIG is informed that future LCC meetings will be more inclusive with respect to the attendees listed above. Presently, case discussions between the Department and the OCA occur on an as-needed basis and range from in-person meetings to telephone conversations. The Department plans to institute a more systematic and institutionalized method of case review in the future.

The Department has updated its existing case management software from CLIS to CLIS II. This updated software, however, is not configured to capture significant meeting notes from the LCC and the LMC, or the dates of meetings and lists of attendees in order to analyze trends and lessons learned from this type of litigation. At the moment, the SACP will be responsible for the recording and retention of information from the LCC and LMC meetings in a protected form and will be working with the OCA and the Department’s Information Technology Bureau (ITB) to determine the best way to memorialize this information in the future. Formalization of both committees will be completed within the next 3-6 months.

\(^{15}\) It is important to note that the Liability Management Committee is codified in the Department Manual, Volume 2, Section 093.57, as follows: “Responsibilities. The Liability Management Committee (LMC) is responsible for developing strategies to improve risk management policies, procedures, and foster better coordination between Department entities as well as the City Attorney’s Office. Membership. The LMC, chaired by the Department Risk Manager (DRM), is comprised of representatives from the following Department entities: Office of Administrative Services (OAS); Work Environment Liaison Section (WELS); Special Assistant for Constitutional Policing (SACP); Legal Affairs Division (LAD); Office of the Chief of Staff (OCOS); Employee Relations Group (ERG); Professional Standards Bureau (PSB); Internal Affairs Group (IAG); Workplace Investigation Unit [WIS]; and also invited to attend committee meetings are representatives of the Office of the City Attorney (OCA) and the Office of the Inspector General (OIG). Reviewing Officer. The Chief of Police is the Reviewing Authority for this committee.”
B. Claims and Lawsuits Information System (CLIS) II

The OIG Audit previously reported that the Department’s litigation database, CLIS, was not consistently used for data entry and that much of the information was found to be inaccurate. This conclusion was reached by comparing CLIS to the OCA’s litigation database, CLS, which was naturally expected to have identical and accurate information for the same cases. As to data entry, a third of the 49 fields reviewed in the Audit were less than 50% filled out.\(^\text{16}\) Leading to this discrepancy was an admitted lack of communication between the Department and the OCA. The Department is attempting to address some of the circumstances leading to the Audit’s findings of incomplete field entry. The Department and the OCA now have open lines of communication with regard to the current cases, which will facilitate the transferring of accurate case information from one organization to the other.

With regard to the Department’s litigation database, CLIS, upgrades have been installed and the new system, CLIS II, launched on October 29, 2014. CLIS II will provide a clearer understanding of the procedural histories and general details of each case involving the Department, including those pertaining to employment-related litigation. The OIG was invited to participate in two recent meetings as an early introduction to the changes being made. One of the main goals of CLIS II is to increase the usability of the system in order to centralize case information. Recently, Department personnel used unit-specific databases for record-keeping, complicating any attempt at aggregate data analysis. The Department has recognized this issue and has decommissioned such unit-specific databases. The information stored in these databases has been migrated to the new system and all new cases will be entered directly into CLIS II.

At one of the CLIS II meetings in early August 2014, both the Department and the OIG expressed an ongoing concern for consistency and accuracy of data entry, especially in light of the newly added fields. The Department stated that certain fields within CLIS II will require an individual to complete particular fields before advancing to the next field. The number of fields with this requirement will be initially limited. An additional feature of CLIS II will require a supervisor, or command officer, to electronically sign-off before the case is allowed to be closed in the system. It is expected that the supervisor will review the file to ensure that data is properly entered.

C. CLIS II: Policy Review and Lessons Learned

The BOPC required the Department to determine the specific issues that created the liability or litigation risk for each case resulting in an adverse outcome, and then develop “lessons learned” from these cases that would be disseminated to Department staff members with a goal of reducing or preventing similar future behavior. The Department understands the importance of collecting and analyzing this information for the identification of employment-related issues so that targeted training can be developed in the future.

\(^{16}\) OIG Employment Litigation Audit, page 4.
CLIS II now allows a user to input information that may prove useful in identifying recurring problems or issues (a.k.a. “lessons learned”). The Department does not want to speculate on the reasons a case may have settled or received an adverse verdict, and therefore does not want to emphasize entries that may capture information designated as “lessons learned.” The Department’s concern is that such entries may be insufficient to properly record and analyze the complexities of litigation and underlying issues. Even so, the OIG remains optimistic that with consistent use and analysis, the field may assist the Department in the identification of recurring issues and development of targeted training.

The OIG and the Department have discussed the possibility of a regularly scheduled review of this CLIS II data for all fields, including “lessons learned.” The Department has confirmed that CLIS II is capable of some data analysis but cannot perform qualitative data analysis. While other methods are being researched with ITB, the SACP Office will be responsible for recording and retaining significant case information from the LCC and LMC meetings and will also perform review and analysis of such information as needed. This includes review of all Confidential Executive Closed Case Summaries, produced by LAD. The SACP will begin reviewing the OCA’s Confidential Corrective Action Reports for any significant issues regarding training, policies, or procedures. This review process for the Closed Case Summaries, as well as the Corrective Action Reports, will be fully institutionalized within the next 3-6 months. Furthermore, the Department states that each LAD Unit will eventually be responsible for a review of their own CLIS II case information. This review would begin once the suggested LAD reformations, discussed in more detail below, are completed.

D. Employee Mediation Program

The BOPC recognized that the Department’s current means of addressing workplace problems could be improved by creating a mediation program that attempts to quickly resolve particular risk management issues and thereby prevent financial liability to the City. On July 2, 2013, the BOPC directed the Department to create a viable mediation program.

In August 2013, the Los Angeles Police Protective League (PPL) submitted a detailed Workplace Mediation Program proposal to the Department. The Workplace Mediation Program was originally created by the OIG with input from the PPL, the OCA, the BOPC, as

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17 The Confidential Executive Closed Case Summaries are a compilation of documents and notes obtained during the course of the investigation and/or litigation by the investigating officer. When the investigation is finished or the litigation is concluded, the investigating officer organizes the paperwork, drafts a summary of the investigation or litigation, including any notes as to special circumstances or helpful information for future cases, and presents the summary to the Officer-in-Charge. The OCA does not have access to the Confidential Executive Closed Case Summaries.

18 The Confidential Corrective Action Reports are prepared by the OCA for any requested City Council payouts involving settlements or plaintiff verdicts over $50,000. The reports identify the cause of the incident, any remedial action taken, or the reason why no remedial action was taken. Recommendations are provided to the Department for any further actions.

19 Los Angeles Police Protective League’s Proposal/Re: Workplace Mediation Program DRAFT Revision-08.20.13.
well as plaintiff’s attorneys and mediators familiar with this litigation. To date, there is no mediation program or viable alternative to existing programs within the Department. Preliminary conversations between the PPL and the Department regarding a mediation program have occurred. It is unclear what issues remain between the PPL and the Department on this program.\(^{20}\)

The Department confirms that it is committed to the implementation of a mediation or alternative dispute resolution program of some type, and that it is considering a variety of options, including the PPL proposal. The Department is presently conducting research, which includes examination of the Los Angeles County Sheriff’s Department’s Countywide Equity Program, consultation with outside mediation and alternative dispute resolution specialists, and conversations with the Los Angeles Police Command Officers Association. A comprehensive alternative dispute resolution program will likely be in place within the next 9-12 months.

E. LAD Assessment and Employment-Related Claims Investigations

Along with the Status Report, the Department provided an assessment of LAD’s systems and processes. Over the course of two months, a thorough examination of LAD was conducted with a review of files and interviews with key personnel, including the Officer in Charge of each section.\(^{21}\) The LAD Assessment was helpful in understanding how the division operates and what changes are necessary for improvement. In fact, the examination resulted in a thorough list of general, and Unit-specific, recommendations for LAD to address. A timeline for progress, and eventual completion, of the LAD reforms is currently being developed and will be available within one month.

The recommendations pertinent to employment-related litigation include a call for LAD to implement formal protocols that support Executive Directive No. 9, decommissioning Unit-specific spreadsheets and management reports, development of an LAD Guidebook that codifies best practices and promotes uniformity, as well as establishment of regular meetings between LAD and the OCA Risk Manager. The LAD Assessment further states that a good relationship between LAD and the OCA is essential for compliance with Executive Directive No. 9 and proposes areas for further discussion. One of those discussions involves investigation of employment-related claims for damages.

Currently, newly submitted employment-related claims for damages are not investigated by either LAD or the OCA and are rejected automatically. Conversely, there are other types of claims that are fully investigated either by LAD or the OCA. Internal Affairs Group investigates most employment-related claims. They investigate employment-related complaints, but only as

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\(^{20}\) The Department contends that the negotiations related to the mediation program are subject to meet and confer requirements with the PPL. Therefore, the OIG recommends that the BOPC receive further briefings on this program and the negotiations with the PPL in closed session.

\(^{21}\) Evaluations were done for each of the following LAD Units: Legal, Training, Claims Investigation, Traffic Litigation, Civil Litigation, Employment Litigation, and Discovery. The Discovery Unit is comprised of the Pitchess Unit, Subpoena Duces Tecum Unit, and the California Public Records Act/Letters Unit.
to misconduct, not risk management issues. The Department agrees that this practice must change and believes the best approach is for LAD and the OCA staff to work together on these investigations.

F. Training

The Department continues to conduct regularly scheduled trainings, such as Department quarterly trainings, LEADS trainings, and Command Development School, to an audience of command staff, including new captains, lieutenants, and sergeants. Many of these presentations contain segments dedicated to employment-related and workplace behavior issues, with some featuring these as the sole topics. Additionally, in the past six months, the Department’s SACP, and staff, have conducted several risk management trainings involving, and in some cases focusing on, workplace behavior issues.

The Department states that future training plans also include a Risk Management Bulletin and training materials specific to supervisors and other personnel. Newly updated, targeted training, in the form of a written curriculum and advisory materials, will be developed by the Department within the next 4-6 months.

LAD personnel require appropriate legal training to ensure that the processing and analysis of claims and lawsuits is performed correctly and efficiently. The status report confirms that many of the LAD Units would benefit from instruction “beyond the scope of on the job training” currently received. The Department recommends that a separate training fund be established similar to that of the Internal Audits and Inspection Division (IAID). As a part of the aforementioned reforms, LAD’s Training Unit will begin reviewing the Confidential Executive Closed Case Summaries for consistency and completeness, as well as for training issues pertaining to LAD investigators.

V. DEPARTMENT QUARTERLY REPORT RECOMMENDATION

The OIG recommends that the Department submit an Employment Litigation Quarterly Report to the BOPC on the progress made with regard to the strategies outlined in this follow-up report. Similar to the BOPC’s expectation that Internal Affairs Group submit the Quarterly Report on Biased Policing, the OIG feels this is reasonable and beneficial for the Department, the OCA, the OIG and the BOPC.

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22 Department internal complaint system [Complaint Form 1.28 investigations].

23 Once available, the OIG will review the proposed material to determine the scope of training, including how the training will be presented and tracked, and to examine “lessons learned” or targeted training being offered.

VI. CONCLUSION

The OIG outlines the status of each of the foregoing subjects related to employment litigation in the following sections.

VII. STATUS OF RECOMMENDATIONS

Listed below are the recommendations made in the OIG Employment Litigation Audit, approved and adopted by the BOPC on July 2, 2013. Each recommendation is followed by a brief description of the Department’s current status.

1. The OIG recommends that the Department review Executive Directive No. 9 for all Sections applicable to LAPD and implement policies and procedures designed to bring the Department into compliance with the Mayor’s directive.

The Department expects to be in full compliance with Executive Directive No. 9 by June 30, 2015. Presently, the Department is addressing this requirement with the Liability Management and the Litigation Coordination committees. Specifically, the LCC discussions include the case review mandates listed in Executive Directive No. 9. The Department plans to incorporate a more systematic and institutionalized method of these case reviews in the future, which will be completely formalized within the next 3-6 months. The Department also proposed a series of improvements to LAD that would address Executive Directive No. 9. The timeline for completion of these reforms will be available within one month. The timeline will be subject to adjustments as necessary.

2. The OIG recommends that the Department implement the Employee Mediation Program to reduce the number of employee-related lawsuits proceeding to settlement or trial. The program, developed by the OIG in consultation with the Department, the City Attorney’s Office and the Los Angeles Police Protective League, will provide a mechanism for the development of internal remedies for employee grievances, where appropriate.

The Department is evaluating the mediation program proposed by the PPL, as well as other forms of alternative dispute resolution, and plans to have a comprehensive alternative dispute resolution program in place within the next 9-12 months.

3. The OIG recommends that the Department and the City Attorney’s Office conduct formal case reviews whenever a case has a scheduled settlement conference or trial approaching. In order to quickly identify those cases suitable for settlement, the formal review should require the parties to discuss the facts of the case, all claims and defenses, the City’s potential financial exposure and the attorney’s valuation of the case for settlement.

The Department is convening a Litigation Coordination Committee to perform in-depth case review and make litigation decisions for each case. The meetings to date have included the
SACP and OCA representatives but will expand to include other interested parties going forward. The meetings are held on an as-needed basis and will cover the case review subjects mandated for discussion by Executive Directive No. 9. The Department plans to incorporate a more systematic and institutionalized method of these case reviews within the next 3-6 months, and the SACP is working with ITB to explore other methods for recording, retaining, and performing qualitative analysis of employment-related case information, which will also be completed in the next 3-6 months.

4. **The OIG recommends that the Department create a document retention plan specifically for the litigation files and related notes for each employment-related case.**

The Department adheres to the City Clerk’s Office document retention plan, as stated in the City of Los Angeles Charter, Chapter 1: Records, Retention, and Disposition. The OCA will retain all materials and documents involved in claims and lawsuit investigations and ensuing litigation. As clients of the OCA, the Department will have access to these records. Legal Affairs Division will be creating written policy regarding document retention that is to be consistent with the OCA policy. Over the next 3-6 months, the SACP will be working with ITB to create other methods for recording and retaining case information.

5. **The OIG recommends that the Department implement a system to ensure that the significant information for each lawsuit is timely and accurately entered into the appropriate fields within the Claim/Lawsuit Information System or a comparable database.**

CLIS II launched on October 29, 2014. The Department states that data integrity and quality assurance reviews of CLIS II will occur within each of the LAD Units once LAD reforms are complete. A timeline for completion of these reforms will be available within one month. Existing safeguards for timely and accurate data entry include supervisory review of CLIS II case files before they are allowed to be closed. There are also selected fields into which information must be entered before the user may proceed. Initially, the number of fields with this restriction will be limited. A formal process for communicating case information from the OCA to the Department in a systematic, accurate, and timely manner will be implemented in the next 3-6 months.

6. **The OIG recommends that the Department evaluate all employment-related complaints, regardless of outcome, to identify possible areas for improvement and then provide managers the targeted training necessary to implement those improvements.**

The Liability Management and the Litigation Coordination committees will be responsible for comprehensive evaluation of employment-related litigation. The LCC meetings include case reviews per the mandates listed in Executive Directive No. 9. The Department plans to incorporate a more systematic and institutionalized method of these case reviews in the next

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3-6 months and will also create a permanent method for recording, retaining, and analyzing case information that may arise out of these meetings during that time as well. CLIS II is a case management tool only and cannot be used to perform qualitative data analysis. The system does contain a text-only field for input of “lessons learned” information, but the Department is unsure of the field’s usefulness. The SACP will begin reviewing Confidential Executive Closed Case Summaries for areas of improvement soon and will have this review institutionalized within the next 3-6 months. Updated, targeted training and materials will be developed in the next 4-6 months.

7. **The OIG recommends that the Department review with the City Attorney’s Office the facts and circumstances for each lawsuit where there is a settlement or verdict adverse to the City to determine the specific issues that created the liability or litigation risk. Furthermore, the OIG recommends that training is developed to address the “lessons learned” in each case and that such training is disseminated to Department staff members in a relevant manner with a goal of preventing similar future behavior.**

The Department’s Litigation Coordination Committee will perform in-depth case review and make litigation decisions for each case, covering the case review subjects mandated for discussion by Executive Directive No. 9. The SACP will begin review of the CLIS II “lessons learned” field, LAD’s Confidential Executive Closed Case Summaries, and the OCA’s Corrective Action Reports for information pertaining to “lessons learned.” The Department has also recommended that LAD and OCA begin investigations of employment-related claims for damages. The Department plans to incorporate a systematic and institutionalized method of case reviews in the next 3-6 months, which will include a formal process for transfer of case information from the OCA to the Department. A timeline for all of the LAD reforms will be available in one month. It is expected that updated, targeted training, resulting from these reviews and analyses, will be developed in the next 4-6 months.

**VIII. ADDITIONAL RELEVANT MATERIAL**


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26 Documents accessed on October 29, 2014.

