Expert Monitor's Report

ADA/Disability Remedial Plan Report (Fifth Round), *Murray* v. County of Santa Barbara, Case No. 2:17-cv-08805-GW-JPR

On-Site Review: June 8-11, 2026

Produced by:
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Introduction

The *Murray v. Santa Barbara County* is a federal class-action lawsuit challenging access to programs, services, and activities at the Santa Barbara County Jails (SBCJ) for incarcerated persons with disabilities housed in the SBCJ. The United States District Court granted final approval to the Stipulated Judgment on February 2, 2021.

The terms of the *Murray v. Santa Barbara County* Stipulated Judgment includes the Santa Barbara County Remedial Plan, which outlines specific conditions in the SBCJ that the County agreed to remedy. Under the Stipulated Judgment, the County agreed to develop implementation plans to reform specific policies, procedures, and practices for providing accommodations to incarcerated persons with disabilities housed in the SBCJ.

The Stipulated Judgment also required the County to retain experts to monitor the County's implementation of and compliance with the Stipulated Judgment.

The Settlement Monitor's Activities

The Stipulated Judgment describes the duties and responsibilities of the Expert for evaluating and determining Santa Barbara County's compliance with the Santa Barbara County Remedial Plan.

A. Role of the Expert

The duties of the Remedial Plan Experts are as follows:

- The Remedial Plan Expert is required to advise the parties on Defendants' compliance or non-compliance with the Remedial Plan,
- To assist the parties and Court with Dispute Resolution matters, and
- To provide testimony, if required, in any proceedings before the Court.

Within 180 days after entry of the Stipulated Judgment, and then annually thereafter during the term of this Stipulated Judgment, the Remedial Plan Experts must complete a review and non-confidential report ("Annual Report") to advise the parties on Defendants' compliance or non-compliance with the Remedial Plan.

In each Annual Report, the Remedial Plan Experts must state their opinion as to whether Defendants are or are not in Partial Compliance with each component of the Remedial Plan within the Remedial Plan Expert's respective area of expertise. These opinions are referred to in the Stipulated Judgment as "Partial Compliance Determinations."

The Annual Reports will provide, to the extent possible, specific recommendations as to how Defendants may reach Partial Compliance. The Parties shall have an opportunity to respond to any finding regarding Defendants' Partial Compliance with a provision of the Remedial Plan. The Parties shall submit any such response to the Remedial Plan Experts and all counsel within 30 calendar days of the Annual Report completion. Such response(s) shall be appended to the final report.

With appropriate notice, the Remedial Plan Experts shall have reasonable access to all parts of any facility. Access to the facilities will not be unreasonably restricted. The Remedial Plan Experts shall have access to correctional and health care staff and people incarcerated in the jails, including confidential and voluntary interviews, as is reasonable to complete a report and provided it does not implicate security or other privileged information. The Remedial Plan Experts shall also have access to non-privileged documents, including budgetary, custody, and health care documents, and institutional meetings, proceedings, and programs to the extent the Remedial Plan Experts determine such access is needed to fulfill their obligations. The Remedial Plan Experts' tours shall be undertaken in a manner that does not unreasonably interfere with jail operations as reasonably determined by jail administrators. The Remedial Plan Experts shall have reasonable access to individual prisoner health records, including mental health records and custody records.

B. Monitoring Process

The Expert used the following rating system to determine the SBCJ's compliance with the requirements of the Remedial Plan:

Substantial Compliance (SC):

Indicates compliance with all or most components of the relevant provision of the Remedial Plan, and no significant work remains to accomplish the goal of that provision.

Partial Compliance (PC):

Indicates compliance with some components of the relevant provision of the Remedial Plan, and work remains to reach Partial Compliance.

Non-Compliance (NC):

Indicates non-compliance with most or all the components of the relevant provision of the Remedial Plan, and work remains to reach Partial Compliance.

Un-ratable (UR):

Shall be used in cases where the Experts have not been provided data or other relevant material necessary to assess compliance or factual circumstances during the monitoring period, making it impossible for a meaningful review to occur at the present time.

Discontinuation of Monitoring (DOM):

After conferring with Plaintiffs' counsel, defendant's request a finding by the Remedial Plan Expert(s) that Defendants are in substantial compliance with one (1) or more components of the Remedial Plan and have maintained such substantial compliance for a period of at least six (6) months.

Executive Summary

This is the sixth Expert Monitoring Review of Santa Barbara County's compliance with the *Murray v. Santa Barbara County* Remedial Plan, which addresses Americans with Disabilities Act (ADA), Disability Accommodations, and Access for incarcerated persons with Disabilities housed within the SBCJ. This fifth round of monitoring focused on both the Main Jail (MJ) and the Northern Branch Jail (NBJ). The on-site Expert Monitoring Review was conducted on June 8-11, 2026. The Expert Monitoring Review included a review of pre-monitoring documents produced by Santa Barbara County, on-site observations of the intake medical screening process, interviews of staff (ADA Coordinator, Lieutenants, Sergeants, medical providers, medical intake screening staff, custody intake screening staff, property utility workers, Classification Unit staff, program providers, custody housing staff), and disabled incarcerated persons housed in the SBCJ.

An exit meeting was conducted with custody and medical administrative staff, counsel from the Santa Barbara County Counsel's Office, and Aaron Fischer, Plaintiffs' Counsel, on June 17, 2026.

On August 14, 2023, the Court approved interim measures for the implementation of the *Murray v. Santa Barbara County* Remedial Plan. The Expert has included the applicable areas of the stipulation regarding the ADA portion of the *Murray v. Santa Barbara County* Remedial Plan in this report.

Since the last monitoring tour, the County has implemented a process for the housing unit staff to document the provision of the adaptive supports for incarcerated persons identified as having an intellectual/developmental disability. The County has also developed and finalized the ADA site-specific training, including knowledge-based questions, to meet the staff training requirements of the *Murray v. Santa Barbara County* Remedial Plan. The County reports that staff is completing the training, with all staff scheduled to complete the training by July 31, 2026. The Wellpath policies, including those for screening and identifying intellectually/developmentally disabled incarcerated persons and their adaptive deficits and support needs, have also been developed and implemented. Incarcerated persons identified during the medical intake screening process are being referred for evaluation to identify adaptive deficits and adaptive supports. The County continues to work with the ATIMS vendor to include functionality in the JMS/ADA Tracking System required by the *Murray v. Santa Barbara County* Remedial Plan. The ADA Coordinators and custody staff continue to use the existing ADA Tracking System to track disabled incarcerated persons and their accommodations, as well as to document some of the *Murray* Remedial Plan requirements. However, the County has yet to fully implement the requirement for all staff to document the provision of some of these requirements within the ADA Tracking System.

The Expert finds that the County has implemented some practices and processes to assist SBCJ staff in providing equal access to the SBCJ programs, services, and activities as required by the *Murray v. Santa Barbara County* Remedial Plan. This includes:

- Development of the Safety and Security Assessment form

- Development of the Effective Communication Form
- Implementation of Video Phone Tablet with VRS access
- Tracking the provision of the orientation handbook at intake
- Access to the Sheriff's Treatment Program (STP) for incarcerated persons housed in the Behavioral Housing Units and MJ South Dorm
- Revision of the Santa Barbara County Sheriff's Office Hearing Officer Worksheet.
- Installation of ADA-accessible workout equipment in the recreation yards at both facilities.
- Termination of practice housing class members with ADA accessible housing needs in MJ housing units (West, East, Central, Back Central, and Northwest)
- Development of the incarcerated person orientation

Most staff who were interviewed continue to be aware of modifications available and required to be provided to the disabled incarcerated persons. The ADA Coordinators are knowledgeable about the ADA and the *Murray v. Santa Barbara County* Remedial Plan and are a valuable resource for staff. During the monitoring tour, the ADA Coordinators would immediately resolve individual issues identified by the Expert and brought to the County's attention. However, the County must ensure that all staff complete the ADA training, which includes information on the revised policies and procedures and the requirements of the *Murray v. Santa Barbara County* Remedial Plan. Until staff are trained on the revised policies and procedures, staff will not be fully aware of their requirements to ensure incarcerated people with disabilities have access to the SBCJ programs, services, and activities. The Expert recommends that the County focus on the following areas, which serve as essential "building blocks" of an effective jail-based "Disability" program:

- Finalize and implement the revised ATIMS/JMS functionality that allows staff to access and document the specific requirements of the *Murray v. Santa Barbara County* Remedial Plan.
- The Expert continues to recommend that the County move forward expeditiously with the physical plant modifications and improvements at the MJ Intake Release Center (IRC). The physical plant modifications and improvements are key in ensuring the County provides the disabled incarcerated persons meaningful and equivalent access to the SBCJ programs, services, and activities such as work opportunities, education and program classes, recreation activities, out-of-cell opportunities (dayroom), access to telecommunication technology, housing placement in the least restrictive locations, and housing with the appropriate accessible features.

The Expert also recommends the following to facilitate compliance with *Murray* ADA Remedial Plan requirements:

- Ensure all staff (custody, non-custody, and medical) receive the ADA training (CorrectionsOne) approved by the Expert and DRC.
- Implement the ADA Tracking System modifications in ATIMS and ensure staff are trained.
- Ensure staff check and document the check prior to the following processes:
    - Intake Screening

  - Classification interview
  - Assignment of Housing
  - Medical and Mental Health encounters
  - Due Process (Inmate Disciplinary Reports/Grievances)
  - Transportation
- Ensure Jail staff identify incarcerated persons with communication needs and provide and document Effective Communication for due process and clinical encounters.
- Ensure staff provides an SLI for cases where the incarcerated person's preferred method of communication is sign language.
- Ensure staff logs the provision of an SLI or the waiver of an SLI on the SLI log, including:
  - The method of communication of the waiver, and
  - The method the staff used to determine that the waiver was knowing and freely given.
- Ensure disability-related grievances and Disability Requests for Accommodations are responded to within 72 hours of receipt, and sooner when a person's safety or physical well-being is at risk.
- Ensure all ADA-related grievances are tracked as "ADA" for effective review, resolution, and quality assurance.
- Ensure disability-related grievances are identified by the reviewing supervisor, even if the incarcerated person who submitted the grievance did not check the "ADA" box.
- Ensure all ADA-related grievance responses, including the resolution, the basis for denial (if applicable), and the appeal process, are provided to incarcerated persons with a disability.
- Ensure the County regularly reviews the disability-related grievances and complaint information for quality assurance purposes.
- Explore ways to expand community-based program opportunities to disabled incarcerated persons who are housed in the MJ (South Dorm, IRC and BHU's).
- Ensure that staff document when incarcerated persons who require assistive devices are released with assistive devices.
- Ensure that incarcerated persons who require accessible transportation are transported based on their identified transportation accommodations.
- In housing units where an individual with a hearing-related disability resides, ensure public announcements are communicated in a manner consistent with the individual's Effective Communication needs.
- Ensure that Wellpath and custody staff work together to ensure the evaluation and the ID/DD Housing Unit Adaptive Support Needs Log reliably identify the required supports consistent with the individual's needs.
- Ensure that in cases where an incarcerated person is known to have or suspected of having an Intellectual or Developmental Disability, the County contacts the appropriate Regional Center within the next business day of the incarcerated person's arrival at the Jail.
- Ensure staff document adaptive supports on the ID/DD Housing Unit Adaptive Support Needs Logs, and supervisors review the logs as required weekly.
- Develop a Monitoring/Accountability Plan.

The Expert's report identifies areas of compliance and non-compliance. As the County implements vital components of the *Murray v. Santa Barbara County* Remedial Plan, including those listed above, areas found non-compliant will progress to Partial Compliance.

This report details the pre-monitoring tour document review, on-site monitoring, and staff and incarcerated-person interviews, and includes findings and recommendations/actions that the County must take to move toward achieving full Compliance with the *Murray v. Santa Barbara County* Remedial Plan.

Summary of Ratings

Remedial Plan Citation	Requirement	Current Rating	Previous Rating
5.A.1	ADA Policy	DOM	DOM
5.B.1	ADA Coordinator	DOM	DOM
5.B.2	Designated ADA Coordinator	DOM	DOM
5.B.3	ADA Coordinator Duty Statement	DOM	DOM
5.B.4	ADA Coordinator Postings	DOM	DOM
5.C.1	ADA Notice to Prisoners	DOM	DOM
5.C.2	Orientation Handbook	SC	PC
5.C.3	Orientation Video	DOM	SC
5.D.1	ADA Training	PC	PC
5.D.2	Modality of ADA Training	PC	PC
5.E.1	Development of ADA Tracking System	PC	PC
5.E.2	Requirements of ADA Tracking System	PC	PC
5.E.3	Availability of ADA Tracking System and Input Requirements	PC	PC
5.E.4	Requirement to Print Disability Accommodation on Wristband	DOM	DOM
5.E.5	Requirement for Staff to Check ADA Tracking System	PC	PC
5.F.1	Identification and Screening of Disabilities	SC	PC
5.F.2	Revision of Screening Process	DOM	DOM
5.F.3	Input of ADA Screening Results in ADA Tracking System	PC	PC
5.G.1	Revision of ADA Request Form	DOM	DOM
5.G.2	ADA Grievance Procedures	DOM	DOM
5.G.3	Provision of SLI During Grievance Interview	SC	PC
5.G.4	ADA Grievance Response and Process	PC	PC
5.G.5	Grievance Form ADA Checkbox/Grievance Processed as ADA When ADA Checkbox is Not Checked	PC	PC
5.G.6	Availability of Grievance Forms/Large Print Grievance Forms	DOM	DOM
5.G.7	Written Grievance Responses	PC	PC
5.G.8	Informing Incarcerated Persons of Grievance Procedures	DOM	DOM
5.G.9	Grievance Tracking System	PC	PC
5.H.1	Implementation of ADA Housing Assignment System	SC	PC
5.H.2	Housing of Disabled Incarcerated Persons	PC	PC
5.I.1	Accessibility of Family/Personal Visitation	PC	PC

5.I.2	Individualized Assessment of Disabled Incarcerated Persons for Visitation	DOM	SC
5.J.1	Access to Programs, Services and Activities	PC	PC
5.J.2	Reading and Scribing Assistance	PC	PC
5.J.3	Equitable Job Opportunities	SC	PC
5.K.1	Timely Provision and Operation of HCA/AD/DME	DOM	DOM
5.K.2	Primary Consideration of Accommodation/ Device	PC	PC
5.K.3	Retention of HCA/AD/DME (Individualized Assessment)	PC	PC
5.K.4	Release of Incarcerated Persons with HCA/AD/DME	PC	PC
5.L.1	Accommodations During Transport	PC	DOM
5.L.2	Prescribed HCA/AD/DME During Transport	DOM	DOM
5.L.3	Accessible Vehicles	DOM	DOM
5.L.4	Assistance On and Off Transport Vehicles	DOM	DOM
5.M.1	Effective Communication Policy	PC	PC
5.M.2	Effective Communication Assessment	PC	PC
5.M.3	Assessment of Effective Communication Needs at the Beginning of Medical Screening and Classification	PC	PC
5.M.4	Enhanced Procedures for Effective Communication	PC	PC
5.M.5	Provision of Effective Communication	PC	PC
5.M.6	Primary Consideration of Effective Communication Needs	PC	PC
5.M.7	Outside Education Program and Providers' Requirement of Effective Communication	PC	SC
5.N.1	Identification of Preferred Method of Communication (Deaf and/or Hard of Hearing)	DOM	DOM
5.N.2	Provision of Sign Language Interpreters	PC	PC
5.N.3	Sign Language Interpreter Log	PC	PC
5.N.4	Waiver of a Sign Language Interpreter	PC	PC
5.N.5	Sign Language Interpreter Contract	DOM	DOM
5.N.6	Use of Lip Reading as Preferred Method of Communication	PC	PC
5.N.7	Use of Most Effective Form of Communication When SLI is not Practical or Waived	PC	PC
5.N.8	Provision of Videophones	DOM	DOM
5.N.9	Time of Usage for TTY/TDD or Videophone	PC	PC
5.N.10	Provision of SLI for Education, Vocational, and Religious Programs	PC	PC
5.N.11	Public Announcement	PC	PC
5.O.1	Intellectual Disability Policy	PC	PC

5.O.2	Regional Center Contact for Incarcerated Persons With Intellectual Disabilities	PC	PC
5.O.3	Accommodations for Incarcerated Persons With Intellectual Disabilities	PC	PC
5.O.4	Development of an Individualized Plan by a Multidisciplinary Team for Incarcerated Persons With Intellectual Disabilities	PC	PC
5.P.1	ADA Transition Plan	PC	PC
5.P.2	Implementation of Transition Plan	PC	PC
5.P.3	Accessibility at the North Branch Jail	DOM	DOM
5.Q.1	Policies for Alarms and Emergencies	PC	PC
5.Q.2	Visible Markers and List to Accommodate Incarcerated Persons During Alarms/Emergencies.	DOM	DOM
5.Q.3	Installation of Visual Alarms	PC	PC
5.Q.4	Posting of Emergency and Fire Routes	DOM	DOM
5.R.1	ADA Compliance Monitoring	PC	PC
5.R.2	ADA Accountability Plan	PC	PC

Findings

5. A. Policy

5.A.1. It is the County's policy to provide access to its programs and services to incarcerated people with disabilities, with or without reasonable accommodations, consistent with legitimate penological interests. No person with a disability, as defined in 42 U.S.C. § 12102, shall, because of that disability, be excluded from participation in or denied the benefits of services, programs, or activities or be subjected to discrimination. It is the County's policy to provide reasonable accommodations or modifications, consistent with 28 C.F.R. §§ 35.150 & 35.152, and other applicable law.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5. B. ADA Coordinator

5.B.1. The County shall have a designated Americans with Disabilities Act (ADA) Coordinator whose position is dedicated to coordinating efforts to comply with and carry out ADA-related requirements and policies. The ADA Coordinator shall have sufficient authority to carry out such duties and shall work with the executive management team regarding ADA compliance, Training, and program needs.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

request and has agreed to discontinue monitoring for this provision.

5.B.2. The County intends for the ADA Coordinator to be based at the Main Jail. Any County jail facility that does not have the ADA Coordinator on site shall have a designated staff member on site at that facility who will have responsibility to monitor day-to-day ADA compliance and will report to the ADA Coordinator.

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.B.3. The County shall clearly enumerate the job duties and Training requirements for the ADA Coordinator position.

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.B.4. The County will ensure that the name of and the method for people to contact the ADA Coordinator (or facility designee) are clearly posted in the intake area and in every jail housing unit. The County will also ensure that the name and contact information (address, phone, email) of the ADA Coordinator (or facility designee) are available to the public, including posting in each Jail's main lobby and online.

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5. C. ADA Notice to Prisoners

5.C.1. The County shall ensure that people with disabilities held at the Jail are adequately informed of their rights, including but not limited to:

a) The right to receive reasonable accommodations;
b) The process for requesting a reasonable accommodation;
c) The role of the ADA Coordinator (and designee) and method to contact them;

d) The grievance process, location of relevant forms, and process for getting assistance in completing request and grievance forms;
e) Instructions on how to request and access health care services, including the provision of Effective Communication and other accommodations in accessing those services.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.C.2. Within 6 hours of processing and classification, the County will provide all incarcerated people a Custody Operations Orientation Handbook in an accessible format, containing a designated section with ADA-related policies, procedures, and other information. The Orientation Handbook shall be made available in large print (at least 18-point font) in English and Spanish to accommodate people with visual impairments.

Compliance Rating: Substantial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it provides all incarcerated people a Custody Operations Orientation Handbook within the timelines set forth in this requirement. The Handbook is available in 18-point font in English and Spanish. The County notates JMS when an inmate is provided a copy of the Handbook. Additionally, the County instituted a daily report to track and monitor the timely issuance of the handbook. The county plans to ensure the handbooks are being handed out during the intake process to ensure compliance with the 6-hour requirement.

Analysis/Observations:

During the on-site review, staff who provide incarcerated persons with disabilities at the Santa Barbara County Sheriff's Office Custody Orientation Handbook at the NBJ and MJ stated that incarcerated persons are provided with the Handbook when processing property and issuing jail clothing.

The County has added a field to the ATIMS property screen to document when Orientation Handbooks are provided to incarcerated persons. The County produced Custody Operations Orientation Handbook Distribution Reports for the document production period (August 1, 2025, to March 31, 2026). The Expert selected two (2) reports for each month (18 reports). A total of 249 incarcerated persons were listed in the reports. Of the 249 entries, in 37 cases (8 percent), the Orientation Handbook was issued to the incarcerated person more than six (6) hours after processing/classification.

There was only one (1) date (1/31/26) when all incarcerated persons were issued the Orientation Handbook within six (6) hours of processing/classification.

The following dates had a higher number of cases in which the Orientation Handbook was issued to the incarcerated person more than six (6) hours after processing/classification.

- On September 30, 2025, of the 20 total cases, five (5) were non-compliant.
- On August 31, 2025, of the 14 total cases, eight (8) were non-compliant.

The County reports the Handbook is available in 18-point font in English and Spanish. The County produced both Spanish and English versions of the Santa Barbara County Sheriff's Office Custody Orientation Handbook in 18-point font. The Expert confirmed that the Spanish version of the Santa Barbara County Sheriff's Office Custody Orientation Handbook is available for issuance as needed.

Although the Expert finds this is not a systemic issue and finds the County in substantial compliance with this provision, the County must ensure that incarcerated persons receive a Custody Operations Orientation Handbook within 6 hours of processing and classification.

5.C.3. *The County will provide an accessible video that presents the contents of the Orientation Handbook, including the ADA-related policies, procedures, and information. The County will, as appropriate, provide an SLI to interpret the contents of the Orientation Handbook to persons who are deaf or hard of hearing who use American Sign Language as their primary means of communication.*

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Substantial Compliance

Pursuant to Paragraph 52 of the Remedial Plan, the County has been in substantial compliance with this provision and has maintained such substantial compliance for a period of at least six (6) months. Based on this, the parties conferred, and Class Counsel has no objection to the County's request and has agreed to the discontinuation of monitoring for this provision.

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County Response:

The County reports the Expert found the County in substantial compliance for this provision.

Analysis/Observations:

The County has developed an orientation video, and the Expert and Plaintiffs' class counsel reviewed and provided recommendations, which were incorporated into the video. The video includes the information required by the *Murray v. Santa Barbara County* Remedial Plan:

The video is being shown in the MJ Intake Release Center. There are two televisions positioned on the walls outside the intake holding cells. Additionally, the County reported that the Orientation Video is shown daily on the County televisions (MJ and NBJ). During the review of interviews with incarcerated persons, eight (8) of 18 who arrived during the document production period reported having watched the video. However, the Expert notes that as part of the initial ADA interview, the ADA staff ask the incarcerated person if they have seen the orientation video.

The County has developed an orientation video, and the Expert and Plaintiffs' class counsel reviewed and provided recommendations, which were incorporated into the video. The video is a PowerPoint slide presentation with auto-play and voice-over narration, accessible to incarcerated persons with low vision and who are blind. The County must ensure that an SLI is used to interpret the Orientation for incarcerated people with disabilities who are Deaf and/or Hard of Hearing, use American Sign Language as their primary means of communication, and are unable to read the Orientation video. Although no specific cases were identified during the rating period, the County has a contract with "Purple Communications" for on-demand sign language interpreting services. This service should be used to interpret the contents of the Orientation Handbook, as appropriate, for persons who use Sign Language as their primary means of communication. Additionally, the Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed the policy includes the requirement for staff to provide an SLI to interpret the contents of the Orientation Handbook to persons who are deaf or hard of hearing who use American Sign Language as their primary means of communication.

5. D Staff Training

5.D.1. The County shall ensure all custody, health care, facility maintenance, and other Jail staff receive ADA training appropriate to their position. The County shall provide Training to all staff during the Academy and at least biannually thereafter on:

a) Disability awareness, including the use and purpose of accommodations and modifications in accordance with the ADA;

b) Use of force when interacting with people with disabilities.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County's Crisis Intervention and De-escalation Training addresses use of force when interacting with people with disabilities. The County provides ADA training, which was approved by the ADA Expert, in the academy for Custody Deputies. The County has also completed a comprehensive ADA training curriculum that incorporates all training requirements of the Remedial Plan. This ADA training is pending final review by the ADA Expert and Class Counsel. Once approved and finalized, the County will initiate training to all staff and will repeat the training bi-annually as required by this provision. The County will be conducting the first of these trainings using the Expert and Class Counsel approved training in October and will be rolling out the training custody wide in the next 6 months.

Analysis/Observations:

The County produced the following four (4) PowerPoint slide presentations:

- Updated ADA Training and *Murray* Slides (36 slides)
- Updated ADA Identification Process (36 slides)
- Updated ADA Reasonable Accommodations and Modifications (46 slides)
- Updated SBSO ADA Policy and Procedure (44 slides)

The Expert and plaintiffs' class counsel have reviewed, provided feedback that was incorporated, and finally approved the ADA training materials. During the previous on-site review, the County proposed the following six (6) - month initial implementation plan, including proposed training modalities and proof of practice.

- Beginning in 2026, the Training will be submitted for Standard and Training for Corrections (STC) certification and Incorporated Into the Annual Training cycle for custody staff.
- Training will include a competency-based quiz. If individuals do not meet the competency threshold, they will be required to retake the Training.
- Training compliance will be reported to the Quality Management Committee quarterly by the CQ, and corrective action plans will be developed if necessary.
- For all non-in-person trainings, the contact email addresses for the CQA/ADA staff will be included for any questions training participants have.

Staff	Modality	Timeline	Proof-of-Practice
Custody (Existing)	Corrections1 (online), four (4) Modules, and then biannually in	Corrections 1 Training in 2025. The annual training cycle starts in 2026	Automated report of attendance and deficiency report uploaded to Box

	person as part of the annual training cycle		
Custody (New Employee)	During Academy and Corrections1	The Academy will start in 2026. In 2025 will be identified for Corrections1	Automated report of attendance and deficiency report uploaded to Box
Healthcare	Emailed modules to all staff	Training Modules will be sent out by Wellpath	Report to CQA from Wellpath and uploaded to Box quarterly
Non-Custody	In-person, one (1) class per month (as needed)	CQA to provide monthly Training to new employees and include existing staff in the first three (3) months	Sign-in sheets uploaded to Box
Programs Staff	In-person, one (1) class per month (as needed)	CQA to provide monthly Training to new employees and include existing staff in the first three (3) months	Sign-in sheets uploaded to Box

The Expert and plaintiffs' class counsel agreed with the training implementation plan. The Expert and plaintiffs' class counsel recommended that, prior to the CorrectionsOne training being rolled out, the PowerPoint presentation be revised to include detailed information on the County's ADA policies, procedures, and practices. The County finalized the PowerPoint presentation for the CorrectionsOne training and, in January 2026, assigned it to all custody staff, with a target completion date of July 2026. The County produced the CorrectionsOne Academy Course Report, which reflects the following:

- 64 staff have completed modules 1 and 2
- 42 staff have completed module 1

The Expert notes that of 218 custody staff assigned to the jails, 112 have not completed any of the CorrectionsOne ADA Modules.

The County also produced ADA PREA class attendance rosters. The rosters reflect that the following custody and non-custody staff attended the five (5) hour training:

10/3/25 – 12 custody staff
10/7/25 – 9 non-custody staff
10/21//25 – 15 non-custody staff
11/4/25 – 5 non-custody staff
11/18/25 – 11 non-custody staff
12/8/25 – 25 non-custody staff
1/20/26 – 8 non-custody staff
2/23/26 – 5 non-custody staff
2/26/26 – 2 non-custody staff
3/12/26 – 2 non-custody staff

3/16/26 – 5 non-custody staff

Course Rosters for the ACO Core Custody Academy indicate that 14 staff attended the Training which the County reports includes ADA training on the DRC *Murray V. Santa Barbara County* Remedial Plan.

ADA Training for medical staff is provided by Wellpath. Wellpath produced an Excel Spreadsheet "Course Comp 6083 0046 ADA 2025-2026 that reflects that – 94 staff completed the training during the document review period.

Although ADA training for medical staff is provided by Wellpath, the Expert noted that the ADA Training PowerPoint does not include *Murray v. Santa Barbara County* site-specific information.

In its feedback, the County requested that the *in-person* requirement of this provision (ADA Training) be removed such that biannual training is conducted through other modalities—including Corrections1. The Expert notes that the County committed to provide in-person training following the initial Corrections1 online training. The Expert agreed that the initial ADA biannual could be conducted via Corrections1 so that staff could receive the required training pending the in-person training. The Expert notes that Class counsel is open to meeting and conferring regarding a County proposal for ADA training that addresses the County's practical concerns while retaining a regularly occurring in-person component (*i.e.*, not a one-time initial deputy training alone). The Expert notes that the parties intend to confer, and will provide input as appropriate, on this issue in the next round.

To reach substantial compliance with provision 5.D.1, the County must:

- Ensure all custody staff, non-custody, and medical) receive the ADA training (CorrectionsOne) approved by the Expert and DRC.
- Ensure non-custody staff receive ADA Training provided by ADA staff.
- Ensure that Wellpath includes the *Murray v. Santa Barbara County* site-specific information in its ADA training.
- Ensure medical staff receive the Wellpath ADA Training.
- Provide the Expert proof of practice for the completion of the CorrectionsOne.
- Provide the ADA "in-person" training to all staff (bi-annual).
- Provide the Expert proof of practice for the completion of the ADA in-person training.

5.D.2. Staff ADA training shall include formalized lesson plans and in- classroom or virtual Training for all staff provided by qualified ADA instructors.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. Please see response to 5.D.1. above. The County worked with the ADA Expert to formalize a lesson plan as required by this provision and has submitted to STC for certification. The County anticipates completing this provision in the next 12 months due to scope of the project and the STC certification process.

Analysis/Observations:

As reported in 5.D.1 above, the County has developed an ADA training curriculum as in the process of revising the Training that will be provided to staff via the CorrectionsOne online platform.

To reach substantial compliance with provision 5.D.2, the County must:

- See provision 5.D.1.

5. E. ADA Tracking System

5.E.1. The County shall, in consultation with Plaintiffs' counsel, develop and implement a comprehensive, standardized electronic system ("ADA Tracking System") to track people with disabilities and their accommodation and Effective Communication needs.

On August 14, 2023, the Court approved the following interim measures for the implementation of the Remedial Plan:

Defendants shall implement a comprehensive, standardized electronic system ("ADA Tracking System") to effectively track people with disabilities and their accommodation and Effective Communication needs, as follows:

1) *Go-Live of ADA Tracking System. No later than June 1, 2024, Defendants will activate a Remedial Plan-compliant ADA Tracking System, which will be readily available and utilized by custody, medical, and mental health staff, and other staff as necessary to ensure provision of accommodations and program access for people with disabilities.*
2) *Staff Training on ADA Tracking System. No later than September 1, 2024, all relevant staff will receive Training on the ADA Tracking System to ensure effective implementation.*

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision and the related requirements in the August 2023 Stipulation re Interim Measures. The County developed a comprehensive tracking system in compliance with this provision, which

it successfully deployed, resulting in a 98.8% success rate when comparing the MTO information and the ADA tracker during the last rating period. While such success demonstrates that the current ADA tracking system is working, the County is in the process of upgrading its Jail Management System (ATIMS) to allow for more seamless functionality and integration of information between custody, medical, and mental health staff as well as an improved ADA Tracker. The County is working with the vendor to incorporate suggestions made by the ADA Expert. The County anticipates the new system in place within the next nine months. Please also see the County's response to provision 5.E.3 regarding the ADA Expert's comments regarding real-time entry in the ADA tracker. Provision 5.E.3 is the only provision that requires real-time entry when inputting information into the ADA tracker.

Analysis/Observations:

The County continues to use the current ATIMS Jail Management Software as its Jail Management System (JMS). The JMS has some functional capability to track people with disabilities and some of their accommodation needs. The County has made some modifications to the JMS to allow it to track people with disabilities and their accommodation and Effective Communication needs, as required by the *Murray v. Santa Barbara County* Remedial Plan. Some of the modifications include:

- Inmate History Notes to track and document ADA-Accommodation at Release,
- Inmate History Notes to track and document ADA Accommodations Removal,
- Inmate History Notes to track and document ADA-VRS and Videophone usage,
- Inmate History Notes to track and document ADA-Effective Communication,
- Inmate History Notes to track and document ADA-Inmate Check,
- Inmate History Notes to track and document ADA -SLI.
- Inmate History Notes to track and document ADA-Accommodation Refusal.
- Inmate History Notes to track and document ADA-Armstrong Reports.
- Inmate History Notes to track and document ADA-Transportation.
- Inmate History Notes to track and document ADA-Accommodation Check.
- Inmate History Notes to track and document ADA-Misc.

Staff interviewed reported that the current process is as follows: once a disability is verified and the accommodations are approved, an MTO is generated and routed to Classification Unit staff and the ADA Coordinator. Upon receipt of the MTO, Classification Unit staff and/or the ADA Coordinator enter the ADA Flags in the ATIMS JMS.

Classification staff interviewed stated that if no MTO is received prior to classifying the incarcerated person, they call medical staff to inquire whether there are any disability or housing restrictions. Classification staff also stated that in some cases, they do not receive the MTO and call medical staff to obtain the information.

The County reports that it has established a process in which cases with an ADA Flag are placed on the ADA Active Alert list, which is automatically generated and distributed to all Jail staff by the County's Information Technology system. The

information in the "Notes" column of the ADA Active Alerts List is still entered manually by the ADA Coordinator upon receipt and review of the MTO. Information that is manually entered by the ADA Coordinators includes:

- Impairment (Type of Disability)
- Special Devices (HCA/DME/AD)
- Accommodations (No stairs, Lower Tier, Lower Bunk)
- Alarm/Emergency (Notification)
- Vehicle Accommodation
- Effective Communication
- Additional
- Armstrong Notification

Information in the ADA Tracker includes:

- Gender
- Name
- CID Number
- Housing
- Classification
- Date in Custody
- Inmate Alert
- Person Alert
- Diet Alert
- Note
- Expiration Date

The County's process includes the following workflow. The MTO is completed and approved by the Medical Provider after an individualized evaluation and is provided to custody staff (Classification and ADA Coordinator).

1. The arresting officer brings the Inmate to the Nurse.
2. Nurse assesses Inmate for medical issues, including identified ADA concerns and accommodations.
3. Nurse completes MTO and saves as PDF.
4. Nurse emails MTO (PDF) to CustodyClassification@sbsheriff.org and ADA@sbsheriff.org.
5. ADA Coordinator receives emailed MTO.
6. Custody Classification receives emailed MTO.
7. ADA Coordinator confirms MTO accommodations are provided.
8. Custody Classification adds PDF to the inmate's electronic booking file.
9. Custody Classification inputs necessary JMS Flags
10. Custody Classification enters accommodations into the JMS Classification narrative.
11. Nurse prints MTO.
12. The nurse gives the printed MTO to the arresting officer.
13. The arresting officer and Inmate leave the pre-booking area and go to Custody Booking/Intake.

14. The arresting officer gives the intake deputy the booking paperwork and paper MTO.
15. The intake deputy ensures that each MTO inmate is accommodated in accordance with ADA requirements.
16. Intake deputy gives paper MTO to Inmate.

During the previous monitoring period, the Expert noted that item 13 is specific to the SBJ and recommended that the County incorporate the NBJ process into the workflow. The County had previously reported the language would be changed to "prebooking medical area." The County has not informed the Expert that this has been completed. The Expert requests that the County revise the workflow.

The ATIMS JMS includes categories (check boxes) that the Classification Unit staff and/or the ADA Coordinators can populate. The ATIMS flag alert entry screen includes Always Alerts, Active Inmate Alerts, and Diet/Other Alerts. The Always and Active Alerts include 101 individual checkboxes, while the Diet/Other Alerts include 26.

Of the 101 Always and Active Alerts, the following are disability-related:

- Alzheimer's
- Blind
- Deaf
- Dementia
- Diabetes
- Hearing Impaired
- Intellectually Disabled
- Lower Tier Required
- Paraplegic
- Prosthesis
- Psychiatric/Mental Health
- Quadriplegic
- Walker
- Wheelchair
- Amputee
- Armstrong Notification
- Cane-Walking
- Cannot Walk Long Distances
- Crutches
- Developmentally Disabled
- HARP Inmate
- ADA
- ADA Housing
- ADA Van
- BHU
- BHU Graduate
- BHU Pending

- CGM (Continuous Glucose Monitor)
- Effective Communication
- Extra Blanket
- Extra Mattress
- Lower Bunk Required
- Medical Equipment
- Mental Health IDR Review
- Needs Level Terrain
- No Stairs
- Serious Mental Illness
- Work Restrictions
- Not cleared for work status
- Shoes diabetic (MTO on File)
- Shoes – Inserts (MTO on File)
- Shoes Orthotics (MTO on File)
- Tri-Counties Patient
- Work Restrictions
- ADA Van
- MAT
- Mental Health Patient
- Van Only

As noted above, the ADA Coordinators continue to manually enter disability-related information into the "Notes" column of the ADA Active Alert list. This manual process does not allow the County to input disability-related information in real time as required by provision 5.E.3 ("Health care staff, the ADA Coordinator, and any ADA Coordinator-designee shall have the ability to input information into the ADA Tracking System in real-time"). During the on-site review, the Expert noted a case in which the "Notes" column was blank in the ADA Tracker. Upon review, it was determined that staff had inadvertently removed the "Notes" and had not re-added them. This manual process can lead to entry errors as in this case. The Expert also noted the following discrepancies in the ADA Tracker:

- An incarcerated person had an ADA Van flag *and* a "Van Only" flag, which causes confusion. (He reported that he may be comfortable on the regular van, so long as he has a wheelchair provided to him on both sides of transport.
- An incarcerated person had an ADA Van flag *and* a "Van Only" flag listed on the ADA Tracker.
- An incarcerated person had an "ADA Van" alert but also listed "N/A" for Vehicle Accommodation on the ADA Tracker.
- An incarcerated person had a wedge pillow, and it was not listed on the ADA Tracker.
- An incarcerated person had a walker, and it was not listed on the ADA Tracker.

The Expert notes that the County needs to implement functionality to log the provision of accommodations (adaptive supports) for incarcerated persons with verified intellectual and learning disabilities. In the interim, the County has implemented the ID/DD Housing Unit Adaptive Support Needs Log to document adaptive supports provided by housing unit staff.

Although the County has made some modifications to the ADA Tracking system (within the existing JMS), the current system does not meet all the requirements of the *Murray v. Santa Barbara County* Remedial Plan. The County has worked to automate the distribution process of the Active Alert List. This allows some disability-related information to be distributed to Jail staff more expeditiously (the report is automatically emailed to all Jail staff once a day). Essential disability- and accommodation-related information is entered into the "Notes" section; however, the ADA Tracking system does not have the functionality for healthcare staff, the ADA Coordinator, or any ADA Coordinator-designee to enter disability-related information in real time.

During a previous on-site tour, the Expert and a representative from DRC met with the County and the ATIMS JMS vendor to discuss the functionality required by the *Murray v. Santa Barbara County* Remedial. The discussions were positive, as the vendor reported that the ATIMS JMS would meet the County's needs and could include the functionality required by the *Murray v. Santa Barbara County* Remedial.

The Expert and DRC previously provided specific, detailed functionality requirements for the ATIMS JMS to satisfy the requirements of the *Murray v. Santa Barbara County* ADA Remedial Plan.

This includes:

- Effective Communication Form (Section V.M-N)
- Generating a report for the timing of providing the Handbook (Section V.C.2)
- Interface with CorEMR (Section V.E.3)
- Documenting release with the assisted device (Section V.K.4)
- ID/DD form for adaptive supports (Section V.O)
- Way to track that the ADA system was checked before each encounter and other events (Section V.D.5(a)-(g))
- Maintenance of devices – checking functions of the device (Section V.K.1)
- ADA coordinator check-in (7-day and 30 days check—not required) (Note: Other counties have implemented this component to ensure compliance regarding Assistive Device maintenance and provision of housing and program accommodations, Section V.H, V.J, V.K.1 – see, e.g., Orange County Sheriff's Dept policy 8000 at 18-19 (8000.16(a)(7)). The Expert recommends that Santa Barbara County implement a similar process, which will help to facilitate several aspects of Remedial Plan implementation.)
- Safety and Security Form for Removal of Assistive Devices, Retention of Personal Devices as default (Section V.C.1-3)
- SLI Waiver box (can be in Effective Communication) (Section V.N.4)

- Reports for individuals with Effective Communication – grievances, class encounters, etc. (Section V.M-N)
- Dissemination of automated reports (Section V.E.3)
- ADA Request for Accommodation Tracking and Management (Section V.G)
- ADA Orientation completion for people with disabilities, including ADA coordinator check-in (Section V.C.1)
- Armstrong Disability Notifications check (Section V.E.2(d))
- ADA Grievance tracking (Section V.G.9)
- Accommodations for Transportation (Section V.L)
- Housing accommodations (including physical accessibility needs) (Section V.H)
- Program-related access and accommodations for people with disabilities (Section V.J.1-2 (general), V.I (visitation)), including for outside education, program, and service providers (Section V.M.7)
- Inmate worker access and accommodations for people with disabilities (Section V.J.3)
- SLI log (Section VI.N.3)
- VRS/phone access for people with hearing disabilities (Section V.N.8)
- Announcement accommodations for people with hearing disabilities (Section V.N.11)
- Accommodations related to Use of Force (Section V.D.1, V.E)
- Accommodations during Disciplinary Processes (Section III.F.9)

The Expert recommends that, in working with the vendor, the functionality to track the following disabilities/designations be included in the ATIMS revisions:

- DV – Vision
- DH – Hearing
- DM – Mobility
- DW - Wheelchair
- DL – Learning
- DS – Speech
- DI – Intellectual
- DMH – Mental Health
- DO – Other

The Expert also recommends adding the functionality to track the following accommodations, such as:

- Lower Bunk (the County reports there is currently a sub-flag)
- Lower Tier (the County reports there is currently a sub-flag)
- Cane (the County reports there is currently a sub-flag)
- Crutches(the County reports there is currently a sub-flag)
- Walker (the County reports there is currently a sub-flag)
- Wheelchair (the County reports there is currently a sub-flag)
- Accessible Cell (the County reports this can be described in an ADA flag)
- Accessible Shower, the County reports this can be described in an ADA flag)

- No Stairs, the County reports this can be described in an ADA flag)
- Level Terrain (the County reports this can be described in an ADA flag)
- Hearing Aids (the County reports there is currently a sub-flag)
- SLI (the County reports there is currently a sub-flag)
- Lip Reading
- Speak Loudly
- Magnifier
- Assistive Listening Device
- Extra Blanket
- Extra Mattress
- Accessible Transportation
- Adaptive Supports per Individual Plan
- Other Assistive Device: (The County reports there is currently a sub-flag)
- Other Accommodation:

The County continues to work with the ATIMS vendor to move toward an updated ADA System with improved functionality. The County reported that the agreement to upgrade the ATIMS ADA Tracking system was approved by the County Board of Supervisors. Following the Board's approval, the County expects the ATIMS upgrades, including the ADA functionality, to be implemented within one (1) year. Once the ATIMS functionality is implemented, the Expert will assess whether the tracking system includes the functional capability to track people with disabilities, their accommodation, and Effective Communication needs as required by the *Murray v. Santa Barbara County* Remedial Plan.

The County has not met the timeline requirements of the August 14, 2023, Court-approved interim measures for the implementation of the Remedial Plan, which set a deadline for implementation of this provision's requirements in 2024:

1) *Go-Live of ADA Tracking System. No later than June 1, 2024, Defendants will activate a Remedial Plan-compliant ADA Tracking System, which will be readily available and utilized by custody, medical, and mental health staff, and other staff as necessary to ensure provision of accommodations and program access for people with disabilities.*
2) *Staff Training on ADA Tracking System. No later than September 1, 2024, all relevant staff will receive training on the ADA Tracking System to ensure effective implementation.*

To reach substantial compliance with provision 5.E.1, the County must:

- Implement the ADA Tracking System modifications in ATIMS.
- Train all relevant staff on the ADA Tracking System to ensure effective implementation.
- Provide proof-of-practice "training records" to the Expert.

5.E.2. The ADA Tracking System shall identify for each prisoner, as appropriate:

a) Any disabilities and related health conditions;
b) Disabilities that may pose a barrier to communication, including but not limited to learning, intellectual, or developmental disabilities, and hearing, speech, or vision impairments;
c) Accommodation needs, including as to housing, classification, transportation, Effective Communication, adaptive supports, and health care appliances, assistive devices, and/or durable medical equipment (HCA/AD/DME);
d) Class membership in Armstrong v. Newsom (N.D. Cal. No. 94- cv-02307) (i.e., people held in the Jail related to a parole revocation proceeding or term), with their applicable disability classification(s) and accommodation need(s).

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. Please see response to 5.E.1. above. The County is working with County IT to incorporate the ADA Expert's recommendations to refine the JMS Alerts. This should be complete within the next 3 months.

Analysis/Observations:

Once an individual is identified as a qualified individual with a disability, the MTO is routed to the classification staff, who populate the "ADA Flag" checkbox in the JMS. The functional capability to track incarcerated people with disabilities and their accommodations is detailed in 5.E.1 above.

The current MTO (Revised January 22, 2025) includes all of the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

The County will need to ensure that when the modifications to the ATIMS JMS are implemented, they include the MTOs' disability and accommodation identifiers.

Based on the information in the MTO, the Classification Unit/ADA Coordinator enters some information manually, and other information is populated by checking the "ADA Flag." The disability ATIMS ADA Flags (Mobility Impaired, Vision Impaired, Hearing Impaired, assistive devices, and lower tier/bunk) are populated by staff placing a check on the respective Flag(s). All other information (physical limitations, alarm emergency, Effective Communication, vehicle accommodation, additional, and *Armstrong* notices) is entered manually by the Classification staff and the ADA Coordinators. Manually entering this information through this sort of multi-step process leads to human error, and without accurate information, staff may not be aware of the incarcerated person's specific disability and accommodation needs.

The County has been working with the vendor to upgrade the Jail Management System (ATIMS) to enable more seamless functionality and information integration between custody, medical, and mental health staff, as well as to improve the ADA Tracker. The County anticipates that the completion date along with training will be completed by June 2027.

The County has also modified the ADA Active Alert list with the functionality to track Class membership in *Armstrong v. Newsom* (N.D. Cal. No. 94- cv-02307) (i.e., people held in the Jail related to a parole revocation proceeding or term), with their applicable disability classification(s) and accommodation need(s).

This functionality to track accommodation and Effective Communication needs, along with *Armstrong* information, should be embedded in the forthcoming JMS updates.

To reach substantial compliance with provision 5.E.2, the County must:

- See 5.E.1.

5.E.3. The ADA Tracking System's prisoner disability information will be readily available to custody, medical, mental health, and other staff at the Jail to ensure appropriate accommodations and adequate program access for people with disabilities. Health care staff, the ADA Coordinator, and any ADA Coordinator-designee shall have the ability to input information into the ADA Tracking System in real-time.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. Please see response to 5.E.1. above. The County's ADA tracker is transmitted to all custody, medical, mental health, and other staff daily. Presently, the ADA Coordinator and his designee enter information into the ADA tracker in real time. The County is in the process of integrating ATIMS with the healthcare vendor's Electronic Medical Record (CorEMR) through a data exchange. Test script has been run to determine effective integration between ATIMS and CorEMR. Such will allow healthcare staff to input information in real time as required by this provision. The County anticipates this integration to occur within the next three months. The County is in the process of upgrading its Jail Management System (ATIMS) to allow for more seamless functionality and integration of information between custody, medical, and mental health staff as well as an improved ADA Tracker. The County is working with the vendor to incorporate suggestions made by the ADA Expert. The County expects full implementation in the next nine months.

Analysis/Observations:

The County has made some modifications to the ADA Tracking system by automating the distribution process of the Active Alert List. This allows disability-related information to be distributed to Jail staff more quickly (the report is automatically emailed to all Jail staff once a day).

The ATIMS JMS ADA Tracking System is installed on all custody jail staff computer desktops and is available to all jail custody staff, and they have the ability to view all of the ADA Flags that have been entered by the Classification Unit and the ADA Coordinator. All Jail staff are also provided an updated Active ADA Alerts list, which is automatically distributed daily.

Staff interviewed reported that, once a disability is verified and accommodations are approved, an MTO is generated and routed to Classification Unit staff and the ADA Coordinator. Upon receipt of the MTO, Classification Unit staff and/or the ADA Coordinator enter the ADA Flags in the ATIMS JMS. Classification staff interviewed stated that if no MTO is received prior to classifying the incarcerated person, they call medical staff to inquire whether there are any disability or housing restrictions. Classification staff also stated that in some cases, they do not receive the MTO and call medical staff to obtain the information.

As noted in 5.E.1 above, the Classification staff and ADA Coordinators continue to manually enter some of the disability-related information into the "Notes" column of the ADA Active Alert list. This manual process does not allow the County to input disability-related information in real time as required by provision 5.E.3. (Health care staff, the ADA Coordinator, and any ADA Coordinator-designee shall have the ability to input information into the ADA Tracking System in real-time.)

The County must ensure all information for incarcerated people with a qualified disability and their accommodation needs is readily available to custody, medical, mental health, and other staff at the Jail to ensure appropriate accommodations and adequate program access for people with disabilities.

The County must ensure that Classification staff and the ADA Coordinators enter the disability-related information (disability and accommodations) promptly after the MTOs are approved. Real-time entry and tracking will require a comprehensive, standardized electronic ADA tracking system, which the current system cannot provide.

To reach substantial compliance with provision 5.E.3, the County must:

- Ensure that healthcare staff, the ADA Coordinator, and any ADA Coordinator designee can enter information into the ADA Tracking System in real time.

5.E.4. The County will print a prisoner's disability accommodation need(s) on the person's wristband.

Discontinuation of Monitoring

The parties discussed a concern raised that the wristbands may result in the victimization of incarcerated persons with disabilities. The County reported that it is currently using the ADA tracker to identify incarcerated persons who require accommodations during emergencies, and that staff also offer identifying vests to ADA-incarcerated persons who request one. Based on this, the parties advised the ADA Expert that they agreed this provision will not apply and will not be subject to monitoring, as reflected in the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106).

5.E.5. Staff shall check the ADA Tracking System for each prisoner, and document that check, immediately prior to:

a) Intake screening;
b) Classification interview;
c) Assignment of housing;
d) Assignment of programs;
e) Medical and mental health encounters;
f) All due process proceedings, including but not limited to, resolving grievances and disciplinary infractions;
g) All trips to court or outside health care appointments.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County has completed a comprehensive ADA training curriculum that incorporates all training requirements of the Remedial Plan and includes the requirement that staff check the ADA Tracker and document that check at each of these encounters. This ADA training has been reviewed by the ADA Expert and Class Counsel and approved. The County will conduct the initial training in October and roll it out county-wide within the next 6 months initiate training to all staff.

Analysis/Observations:

The County has created "ADA Flags" and "ADA Notes," and reports that they plan to train staff to check the ADA Tracking System and document the check for each incarcerated person prior to intake screening, classification, assignment of housing, medical (medical, dental, and mental health) encounters, and due process proceedings. A review of the Santa Barbara Sheriff's Office Inmate History – Inmate Notes ADA-Accommodations Check indicates that most staff are checking and documenting check-ins in the ADA Tracking system for programs and disciplinary infraction hearings.

The Santa Barbara Sheriff's Office Inmate History – Inmate Notes ADA-Accommodations Check does not – but should – reflect that staff conducted the required checks for intake screening, classification, housing assignment, grievances, and trips to court or outside medical.

Within the CorEMR electronic health record, when Wellpath staff query the system to access an incarcerated person's health record, the dashboard displays in red font "ADA/Special Needs." In addition, a "Highlighted Chart Note" is displayed on the dashboard, including the incarcerated person's preferred method of communication. When the providers access each individual's health record, they can "check" the ADA Effective Communication box and identify the Effective Communication accommodation needs. Although staff do not specifically document the check, staff are reportedly supposed to document the provision of Effective Communication accommodations within the medical progress note. However, as reflected in provision 5.M.4, staff do not consistently provide and document Effective Communication during clinical encounters. Given the staff's failure to document Effective Communication in the health record, the requirement in this provision to conduct and document an Effective Communication check has not been fully implemented.

To reach substantial compliance with provision 5.E.5, the County must:

- Ensure staff checks the ADA Tracking System for each incarcerated person, and document that check immediately prior to:
  a) Intake screening;
  b) Classification interview;
  c) Assignment of housing;
  d) Assignment of programs;
  e) Medical and mental health encounters;
  f) All due process proceedings, including but not limited to, resolving grievances and disciplinary infractions (issuance of initial rules violations and final rule violations);
  g) All trips to court or outside health care appointments.
- Ensure staff are trained on *Murray* Remedial Plan requirements.
- Provide proof of practice to the Expert that the staff conducted and documented the check.

5. F. Screening for Disability and Disability-Related Needs

5.F.1. The County shall take steps to identify and verify each person's disability and disability-related needs, including by screening them for disabilities during medical intake and classification. The County shall ensure that all private health care and other service providers implement any policies and procedures needed to facilitate full implementation of these provisions.

Compliance Rating: Substantial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County is in the process of fully implementing this provision. The County is taking steps to identify and verify incarcerated persons' disabilities and disability related needs and coordinating with Classification, CQA deputies and the ADA Coordinators so that they are aware of inmates' effective communication needs and accommodations. Wellpath also implemented an Adaptive Support Needs Assessment Form to identify possible ADA inmates during receiving, as well as a "learning disability" check box on the MTO. The County has updated the Custody Operations ADA Policy (209) to meet the provisions of this requirement. The County updated its Classification Interview Form, which custody deputies use during the Classification Interview prior to housing incarcerated persons. Such form incorporates the ADA Expert's additional intake questions that are not already achieved in the medical intake process, including those necessary to screen for intellectual and developmental disabilities (ID/DD). Wellpath now has a process for initial and secondary screening to identify the adaptive support needs for the county's current and future ID/DD population.

Analysis/Observations:

The Wellpath Policy HCD-110_E-02 Receiving Screening – Santa Barbara CA (10/29/20), Wellpath Policy HCD-110_F-08 Verification and Accommodation of Disability - Santa Barbara CA (9/27/19), and Wellpath Policy HCD-110_E-04 Initial Health Assessment – Santa Barbara CA (10/29/20) contain the process for the County to identify and verify disabilities and accommodation needs for persons being processed into the Jail.

In addition, the policies include the process for medical staff to identify the incarcerated person's disability-related needs/accommodations (assistive devices, health care appliances, durable medical equipment, housing accommodations, including low bunk/low tier/grab bars/accessible cell, etc.), and Effective Communication needs. During the medical intake screening, the Expert noted that although the policies include directives for medical staff to screen, identify, and verify these disabilities, the County has not implemented an adequate screening process to effectively identify intellectual/developmental disabilities. The screening process includes questions related to the incarcerated person's ability to read or write, prior individual education plan or attended special education classes, which are insufficient.

In 2022, Wellpath piloted a policy and process to screen incarcerated persons for intellectual and developmental disabilities. The pilot screening process included screening questions (Adaptive Needs Assessment) and a referral process to a psychologist for further evaluation for cases of potential Intellectual/Developmental Disability. The screening and identification process included timelines for the psychologist to contact the incarcerated person, with an expedited process for urgent referrals. The psychologist would conduct a record review, psychological testing using

standardized intelligence assessments such as the Quick Test (QT) and the Test of Nonverbal Intelligence-4 (TONI-4), and an Adaptive Support Evaluation. The psychologist would identify adaptive support deficits and adaptive support needs while in custody for cases identified as having an Intellectual/Developmental disability. The psychologist would also develop an adaptive support needs plan. Incarcerated persons who had an adaptive support needs plan were enrolled in the Mental Health Special Needs Program. This program was managed by Wellpath Regional Mental Health Department. Due to management changes, the pilot program was halted, and Wellpath has now redeveloped and implemented the process to include revised policies, secondary screening, and verification/testing process.

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed the policy includes the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

During the onsite monitoring tour, the Expert observed the medical intake screening for two (2) individuals, one (1) at the MJ and one (1) at the NBJ. During the intake screening, all disability-related screening questions were asked.

A review of the Disability Requests for Accommodation and ADA-related grievances found no cases where the incarcerated persons reported that they had not been identified as having a disability during the intake screening process.

The County has a screening process in place to identify physical, intellectual/developmental, and learning disabilities. The Wellpath policies include a process for identifying and verifying disabilities and disability-related needs, including screening persons being processed into the Jail for disabilities during medical intake. The County has also implemented policies to identify Effective Communication needs.

5.F.2. The County, in consultation with subject matter experts and Plaintiffs' counsel, shall revise its ADA screening process to ensure consideration of:

- *a) The individual's self-identification or claim to have a disability;*
- *b) Documentation of a disability in the individual's health, custody, and any other available records;*
- *c) Staff observation that the individual may have a disability that affects placement, program access, or Effective Communication; and*
- *d) The request of a third party (such as a family member) for an evaluation of the individual for a possible disability.*

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.F.3. The County shall ensure that ADA screening results are promptly entered in the ADA Tracking System.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. While the revised ADA Tracking system will streamline the process, under the present system, the ADA screening results are promptly entered into the ADA Tracker. The County is working on updating JMS to include the necessary alerts and will begin training staff in October of this year.

Analysis/Observations:

Gaps in the process for promptly entering ADA screening results into the ADA Tracking System are discussed in Section 5.E, above. The current process for medical staff to generate the MTO, for the MTO to be routed to Classification Unit staff and the ADA Coordinator, and for Classification Unit staff and/or the ADA Coordinator to then enter the ADA Flags in the ATIMS JMS continues to be problematic and ineffective.

The County and Wellpath must ensure that all ADA screening results (intake screening and post-housing screenings) are promptly entered into the ADA Tracking System. Given the limitations of the current ADA Tracking System, until a comprehensive, standardized electronic ADA Tracking System is implemented, staff must ensure that all ADA tracking components are entered promptly and accurately. For discrepancies the Expert identified, refer to section 5.E.1.

To reach substantial compliance with provision 5.F.3, the County must:

- Implement ADA Tracking System modifications in ATIMS to allow ADA screening results to be promptly entered into the ADA Tracking System.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice to the Expert.

5. G. Disability-Related Requests and Grievances

5.G.1. The County shall revise its ADA Request Form to contain an explanation of how to appeal a denial of accommodations.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.G.2. The County shall provide a grievance procedure for people with disabilities to appeal any denial of an accommodation, and to report any disability-based discrimination or violation of the ADA, this Remedial Plan, or Jail ADA-related policy.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.G.3. The County shall ensure that people who are Deaf or hard of hearing are interviewed and provided a qualified SLI as part of the grievance/appeal process.

Compliance Rating: Substantial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reported it has obtained a VRS and VRI account with Purple Communications, so that incarcerated persons who are deaf or hard of hearing have access to contact outside parties and to further ensure they are provided effective communication as part of the grievance/appeal process. Class Counsel and the ADA Expert observed the County's use of VRS and VRI on several occasions. Additionally, an on-call SLI can be utilized for effective communication for incarcerated persons who are deaf or hard of hearing. The County has revised the Custody Operations ADA Policy (209) ADA to incorporate the language recommended by the ADA Expert. While the systems are in place, there have not been any grievances from this population. The County is set to begin training staff utilizing the approved training in October 2025.

Analysis/Observations

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and Custody Policy 361 - Grievance Procedures and confirmed that the policies include the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

A review of the document production reflects that one (1) incarcerated person with a hearing disability who uses sign language communication was housed at the Jail during the document review period. This incarcerated person did not submit any grievances. During subsequent monitoring tours, the County will need to provide documents reflecting the provision of an SLI/VRI to the Expert, if available.

Additionally, staff interviewed stated that incarcerated people who are Deaf and/or Hard of Hearing are provided with a qualified SLI as part of the grievance/appeal process.

The County has a process for documenting the provision of an SLI. There were no cases to review in which an SLI/VRI was provided as part of the grievance/appeal process. The County established a contract with "Purple Communications" on 1/11/23 for on-demand sign language interpreting services.

The Expert notes that the parties agree that for this provision, because (1) there is a clear policy/procedure in place and (2) staff have been trained on (and are knowledgeable of) the requirements, the County has demonstrated Substantial Compliance. These components must be sustained in the next round, and there must be SLI/effective communication proof of practice for every grievance/appeal submitted by an SLI user during the next round (if applicable), for the County to maintain a Substantial Compliance rating.

5.G.4. *To ensure that ADA accommodations requests and ADA grievances are promptly addressed, the County shall:*

a) Respond to an individual's Request for Accommodations within 72 hours of receipt;
b) Respond to an ADA-related grievance within 72 hours of receipt;
c) Establish an expedited process for urgent ADA requests and grievances (e.g., situations in which a person's safety or physical well-being is at risk); and
d) Allow each person to retain accommodation(s) they possess at the time of arrival at the Jail or that they have been previously provided by the Jail, pending review of a grievance/appeal regarding the denial or removal of such accommodation(s), absent an individualized security concern that is documented.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. As discussed with the ADA Expert and Class Counsel, the County will be training staff to provide a response to ADA grievances within 72-hours; as agreed, the response provided is not necessarily resolution of the grievance, but rather, notification that the grievance has been appropriately routed for response. Additionally, the County will be training supervisory-level staff regarding identification of ADA-related grievances even if not marked "ADA" and incorporating such grievances in the existing grievance tracker for review by the ADA Expert. The grievance tracker includes a section specifically enumerated for ADA responses. The County is auditing compliance during the quarterly grievance reviews. Absent security concerns, the County allows incarcerated persons to retain accommodations they possess upon arrival at the jail in accordance with this provision. The County anticipates completing this requirement in the next four to six months. The Sergeants and Lead Supervisors have been trained regarding the agreed upon procedure to ensure the 72-hour requirement is satisfied.

Analysis/Observations

The County produced 27 Disability Requests for Accommodation. The Disability Request for Accommodation Form includes signatures for medical staff, the ADA Coordinator, and the Division Lieutenant. The County reports that upon receipt of the Disability Request for Accommodation, the ADA Coordinator reviews it and, if it requires a medical review, forwards it to the medical staff. The ADA Coordinator provides the incarcerated person with a copy of the Disability Request for Accommodation, indicating that it has been forwarded to medical staff for review and response. When the ADA Coordinator can respond to the Disability Request for Accommodation, the ADA Coordinator responds and forwards it to the Lieutenant for final review/approval. After the Lieutenant signs/approves the response, a copy of the final Disability Request for Accommodation response is provided to the incarcerated person. The initial response provided by the ADA Coordinator within 72 hours is not necessarily the final resolution of the request or grievance.

In a review of the 27 Disability Requests for Accommodation, in five (5) cases, the Disability Requests for Accommodation were not reviewed by the ADA Coordinator within 72 hours of the request; in one (1) case, the Disability Request for Accommodation was not dated by the incarcerated person. The County must ensure the Disability Requests for Accommodation are responded to within 72 hours of receipt by the ADA Coordinator.

The County produced six (6) ADA Grievances. The Expert also reviewed the Grievance Logs that the County produced for all Experts from August 2025 to March 2026. Based on this review, the Expert identified 55 grievances that contain an ADA component but were not identified as ADA Grievances and thus were not produced by the County as part of the ADA document production.

Of the 61 total ADA Grievances reviewed, 50 were not responded to within the required 72 hours. The County previously reported that although the ADA Coordinator reviews ADA-related grievances, the ADA Coordinator currently does not provide the incarcerated person with a notice that the grievance has been forwarded to medical and/or other departments for response. The County also reported that the Disability Request for Accommodation workflow will be implemented for ADA-related grievances. This will notify the incarcerated person that the grievance has been reviewed and will be processed for a response. However, this process has not been implemented.

In 23 cases, the ADA grievance box was checked; however, the grievances were not part of the ADA grievances produced by the County.

For future monitoring, the County must include *all* ADA-related grievance responses in document production. This will require implementing a more effective system to identify and track ADA grievances.

In a review of the ADA-related grievances, there were no ADA-related grievances that were submitted with situations in which the disabled incarcerated person reported issues related to their safety or physical well-being, or issues that put the incarcerated person's safety at risk.

Absent security concerns, the County allows incarcerated persons to retain the accommodations they have upon arrival at the Jail, in accordance with this provision. This essential practice is important, and the County's commitment to its implementation is quite positive.

The problems with tracking (and processing) ADA grievances, as identified in the previous reports, have not been remedied. As described in this section, this problem further demonstrates the need for an effective, comprehensive, standardized ADA Tracking System. The County must ensure ADA grievances and requests for accommodation are timely responded to and processed as required by the *Murray v. Santa Barbara County* Remedial Plan.

To reach substantial compliance with provision 5.G.4, the County must:

- Ensure the County responds to an individual's Request for Accommodations within 72 hours of receipt.
- Ensure the County responds to an ADA-related grievance within 72 hours of receipt.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice to the Expert.

5.G.5. The County shall ensure that grievance forms contain an "ADA" box to indicate that a particular grievance relates to a disability-related issue. The County will ensure that disability-related grievances are so identified by the reviewing supervisor, even if the individual who submitted the grievance does not check the "ADA" box.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

Please see 5.G.4. above

Analysis/Observations

The County produced a blank Santa Barbara County Sheriff's Office Custody Operations – Inmate Grievance Form (SH–585a). The Inmate Grievance Form includes an "ADA" box. All grievances reviewed were submitted on the new form. Concerns about staff's processing of ADA grievances, including use of the "ADA" box, are discussed above.

Staff interviewed stated that when a reviewing supervisor reviews a grievance involving disability-related issues, the grievance is processed and responded to as an ADA grievance. However, the Expert identified 55 grievances that had an ADA component and were not identified and processed as ADA Grievances. The issues include;

- Sleep apnea – one (1)
- Requesting shoes and lower bunk – one (1)
- Requesting MAT treatment – 25 [1]
- Requesting glasses or a vision test/glasses/contacts – five (5)
- Requesting shoes/inserts – 20
- Requesting an extra mattress – four (4)
- Requesting shoes, back brace, and physical therapy – one (1)
- Requesting compression socks – one (1)
- Medical diet – one (1)
- Access to programs – one (1)
- Having to provide daily assistance to ADA incarcerated persons in South Dorm one (1)

As indicated in the previous report, the United States Department of Justice Guidance[2] states, "People with OUD typically have a disability because they have a drug addiction that substantially limits one or more of their major life activities. Drug addiction is considered a physical or mental impairment under the ADA. Drug addiction occurs when the repeated use of drugs causes clinically significant impairment, such as health problems and or an inability to meet major responsibilities

[1] Some of these grievances may not fall under the ADA grievance category
[2] The Americans with Disabilities Act and the Opioid Crisis: Combating Discrimination Against People in Treatment or Recovery

at work, school, or home. People with OUD may therefore experience a substantial limitation of one or more major life activities, such as caring for oneself, learning, concentrating, thinking, communicating, working, or the operation of major bodily functions, including neurological and brain functions. The ADA also protects individuals in recovery who would be limited in a major life activity in the absence of treatment and/or services to support recovery. Under the ADA, an individual's use of prescribed medication, such as that used to treat OUD, is not an 'illegal use of drugs' if the individual uses the medication under the supervision of a licensed health care professional, including primary care or other non-specialty providers. This includes medications for opioid use disorder (MOUD) or medication-assisted treatment (MAT). MOUD is the use of one of three medications (methadone, buprenorphine, or naltrexone) approved by the Food and Drug Administration (FDA) for treatment of OUD; MAT refers to treatment of OUD and certain other substance use disorders by combining counseling and behavioral therapies with the use of FDA-approved medications. Individuals whose OUD is a disability and who are participating in a supervised rehabilitation or drug treatment program are protected by the ADA if they are not currently engaging in the illegal use of drugs."

Based on some grievances related to MAT not being processed as ADA grievances (continuation of MAT treatment), the County must ensure staff are trained on the ADA criteria so they can identify grievances that fall under the ADA. USDOJ Guidance and track the grievances as ADA.

Previously, the ADA Coordinator developed and provided training to the Sergeants who review, categorize, and process grievances. The training included an ADA Grievance Checklist along with the following:

New Grievance Response Procedure for ADA Grievances

1. ADA Grievances Consist of Shoes, Wheelchairs, Walkers, Canes, Crutches, Extra Mattresses, Shower Chair, Low Bunk, Low Tier, Purple, SLI, Etc.
2. All ADA Grievances containing these key words should be marked as ADA no matter what the inmate initially marks them as marks them as per the DRC
3. All ADA Grievances need to be responded to within 72 Hours
    a. Response CAN be Generic per the DRC (Grievance Forwarded to Medical for resolution, or Grievance Forwarded to ADA Coordinator for Resolution)
        i. Make a copy of the front page showing "Generic Response" and put it in the module mailbox, or return it to the deputy to return to the inmate
        ii. Forward the grievance to the named entity that it needs to go to (Medical/ ADA Coordinator)
4. This will allow us to meet the 72-hour initial response requirement for ADA Grievances as well as reset the clock, giving us the full 15 days to answer the grievance while also complying with the DRC's request to "Fully and completely answer grievances before being returned to the inmate."

- ADA Grievance Checklist
  - Included but not limited to:
    - Shoes
    - Double Mattress
    - CPAP
    - Walker
    - Cane Wheelchair
    - Shower Chair/Access
    - Compression Socks
    - Effective Communication
  - Please mark as ADA and route accordingly

The Expert recommended that this checklist also include the following additional categories:

- Glasses/Vision test
- Continuation of Medication-Assisted Treatment
- Requests for LB/LT

However, the issue regarding the processing of grievances that include an ADA component has not been remedied. The County needs to provide additional training to the staff that review, classify, and process grievances.

To reach substantial compliance with provision 5.G.5, the County must:

- Ensure that disability-related grievances are reviewed and that, if the grievance has an ADA component, the reviewing supervisor identifies it as ADA, even if the incarcerated person who submitted the grievance did not check the "ADA" box.
- When an ADA-related grievance is assigned to health care staff for review/response, ensure the ADA coordinators are made aware of the grievance and the response.
- Ensure staff are trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice to the Expert.

5.G.6. The County will ensure that grievance forms are readily available and accessible to all prisoners at all times. Grievance forms shall be made available in large print (minimum 18-point font) to accommodate people with vision impairments.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is

no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.G.7. The County shall provide to the person with a disability a written grievance response, including the resolution, the basis for a denial (if applicable), and the process for appeal.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County provides a written grievance response in accordance with the requirements of this provision. The County's grievance form includes the process for appeal as required by this provision. Managers audit all grievances quarterly to ensure compliance. To address the ADA Expert's concern, when the HIPPA release on the grievance is not signed, custody staff have been trained to contact the incarcerated person, rather than deny the grievance. Please see response to 5.G.5. above. The County has included new copy to advise inmates how to appeal grievances. The County anticipates completing this requirement in the next four to six months.

Analysis/Observations

The County produced six (6) ADA Grievances. The Expert also reviewed the Grievance Logs that the County produced for all Experts from August 2025 to March 2026. Based on this review, the Expert identified 55 grievances that contain an ADA component; however, these grievances were not identified as ADA Grievances and were not produced by the County as part of the ADA document production.

A summary of the grievances is listed in Section 5.G.5.a.

Some responses include the resolution and the basis for denial (if applicable). However, in 10 cases, the grievance does not reflect the decision (Founded/Unfounded). The Expert notes that the grievances now state, "If you are unsatisfied with the response to this grievance, you may submit an appeal by filling out a new grievance form and marking the appeal box above."

Some grievance responses do not address the incarcerated person's request or provide a thorough response. Some examples include:

- #24752 - Requesting an appointment for mobility accommodations. The response states, "Patient is scheduled for an outside appointment to see specialist for a new AFO brace for right foot."

- #24995 – Requesting a wedge pillow. The response states, "Patient was seen 10/26/25 by the provider with no mention of wanting a pillow. Patient was seen multiple times since then by nursing staff with no mention of wanting or needing a pillow. Will place patient on sick call for pillow request."
- #25506 – Requested replacement shoes. The response states, "Placed on nurse sick call to look at shoes for shoe replacement."
- #24739 – Requesting shoes. The response states, "Pt. requested a shoe chrono on 8/31/25 and is pending assessment."
- #23659 – Requesting medical shoes. The response states, "At this time there has not been a sick requesting medical shoes. I have tasked you for nurse sick call."
- #24934 – Requesting to see the eye doctor. The response states, "Patient has not put in a request to have his vision checked. I have tasked pt for a nurse sick call."
- #24646 – Requesting vision checked. The response states, "Patient has not had family bring glasses per RN sick call from 7/13/25. I have tasked patient to receive an eye exam for further evaluation."

To reach substantial compliance with provision 5.G.7, the County must:

- Ensure all ADA-related grievance responses, including the resolution, the basis for a denial (if applicable), and the process for appeal, are provided to incarcerated persons with a disability when responses are provided.
    - Replacement DME/shoes for an existing chrono should not require nurse sick call (#25506). ADA staff, with Wellpath support, can generally assess and replace this kind of DME in poor repair.
    - "Resolution" is not when something is "tasked" for evaluation. Resolution refers to whether the concern is addressed - that is, whether the requested accommodation is provided or the issue otherwise addressed.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice to the Expert.

5.G.8. The County shall take steps to ensure all prisoners are aware of the disability grievance procedures, including the availability of accommodations and staff assistance to submit a grievance and/or appeal.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.G.9. The County shall implement a specific tracking system regarding the submission, processing, and responses for disability-related grievances and complaints, and regularly review such information for quality assurance purposes.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

Please see 5.G.4. above.

Analysis/Observations

The County produced 6 ADA Grievances. The Expert also reviewed the Grievance Logs that the County produced for all Experts from August 2025 to March 2026. Based on this review, the Expert identified 55 grievances that contain an ADA component; however, these grievances were not identified as ADA Grievances and were not produced by the County as part of the ADA document production.

The County conducts quarterly grievance reviews to evaluate trends, identify areas for improvement, and implement corrective measures. The County produced Grievance Review Minutes, Grievance Summaries for the NBJ and SBJ, and a Grievance Report for the 3rdand 4th Quarters of 2025. The Expert also notes that the report includes a summary of the ADA grievances. The summary includes the categories of ADA-Miscellaneous, ADA-Classification/Housing, and ADA-Medical. The Expert previously recommended that, since the County is required to have a specific tracking system for disability-related grievances as part of its QA/QI processes, an analysis of ADA grievances be incorporated into the quarterly Grievance Report. This includes an analysis of whether grievances were appropriately processed as ADA-related and responded to in accordance with the RP timelines. This will help the County reach a point where it can self-monitor and sustain compliance on this and other ADA/disability matters.

To reach substantial compliance with provision 5.G.9, the County must:

- Ensure all ADA-related grievances are tracked as ADA within the grievance tracking system.
- Conduct a quality assurance review of the ADA-related grievances, including the actions the County takes to correct any deficiencies.

5. H. Housing Placements

5.H.1. The County shall implement a housing assignment system that includes an individualized assessment to be completed by health care staff, the results of which shall be documented in the ADA Tracking System, of each person's functional limitations and restrictions, including but not limited to:

a) The need for a lower bunk;
b) The need for grab bars in the Cell and/or shower;
c) The need for accessible toilets;
d) The need for no stairs in the path of travel; and
e) The need for level terrain.

Compliance Rating: Substantial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The Expert found the County in substantial compliance for this provision.

Analysis/Observations:

The County uses a housing assignment system that includes an individualized assessment by health care staff and maintains the following flags in the ADA tracking system: Low Bunk, No stairs, Level Terrain, Grab Bar, and ADA housing (which includes accessible toilets). The County has trained Classification and CQA deputies and has a process to identify and track individuals with disabilities. At the completion of medical intake, Wellpath inputs disability, assistive devices, Effective Communication, and accommodation information into an MTO. The information in the MTO is provided to the Classification Deputy, who then inputs all ADA flag information into the JMS tracking system and emails the ADA Coordinators. The County has updated the ADA Policy (209) to comply with this provision.

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

a) The need for a lower bunk

The Santa Barbara County Sheriff's Office Custody Operations – Policies and Procedures Manual (305 Bed Assignment) addresses the management and assignment of incarcerated people to lower bunks. Additionally, the County has revised the policy to provide guidance and requirements for staff to document checks of the ADA Tracking System when housing disabled incarcerated persons. However, the Classification staff reported that they do not review the ADA Tracking System when making housing changes after initial housing. The County must ensure that Classification staff reviews the ADA Tracking System to identify cases with lower-bunk housing restrictions and ensure they are appropriately housed.

A review of the Disability Accommodations Request and ADA grievances reflects two (2) Disability Accommodations Requests for an LB and one (1) grievance. During the incarcerated person interviews, three (3) incarcerated persons that had a low bunk

flag were housed on an upper bunk and one (1) that had a lower tier flag was housed on the upper tier.

There continue to be no accessible housing options at SBJ other than in South Dorm. However, the Expert notes the current intended practice of housing incarcerated persons with housing accessibility needs at NBJ, and the County has a planned renovation to add ADA-accessible cells in IRC units.

The Expert finds that the County has a process in place to identify a disabled incarcerated person's need for a lower bunk and document the accommodation needs in the current ADA Tracking System.

b) *The need for grab bars in the cell and/or shower*

The County has added "grab bar in the cell and/or shower accommodations" to the ADA Tracking System.

The Wellpath Medical Treatment Order for the Patient includes the documentation of approval for "House in ADA Cell," "Shower Chair/ADA Shower," and "Grab Bars." The MTO is completed and approved by the Medical Provider following an individualized evaluation and is then provided to Classification staff and the ADA Coordinators.

As noted in a) above, the County has implemented a process (Custody Medical Treatment Order MTO Creation, Distribution, and Workflow) to complete and distribute the MTO.

The Expert finds that the County has a process in place to identify the need for grab bars in the cell and/or shower for disabled incarcerated persons and to document that need in the current ADA Tracking System.

c) *The need for accessible toilets*

The County has added accessible toilets to the ADA tracking system.

The Wellpath Medical Treatment Order for Patient includes the documentation of approval for "House in ADA Cell" and "Grab Bars." The MTO is completed and approved by the Medical Provider following an individualized evaluation and is then provided to Classification staff and the ADA Coordinators.

The Expert finds that the County has a process in place to identify the need for accessible toilets among disabled incarcerated persons and to document their accommodation needs in the current ADA Tracking System. However, the physical plant modifications need to be completed at the Intake and Release Center to accommodate the mobility disabled population that requires accessible toilets.

d) *The need for no stairs in the path of travel*

The ADA tracking system includes the Lower Tier accommodation.

The Wellpath Medical Treatment Order for Patient includes the documentation of approval for a Lower Tier. The MTO is completed and approved by the Medical Provider following an individualized evaluation and is then provided to Classification staff and the ADA Coordinators.

The Expert finds that the County has a process in place to identify a disabled incarcerated person's need for no-stairs accommodations in the path of travel (lower tier) and to document these accommodation needs in the current ADA Tracking System.

e) The need for level terrain

The ADA Tracking System includes a flag for level terrain. The Wellpath MTO has been revised to include the need for level terrain. The Wellpath Medical Treatment Order for Patient includes the documentation of approval for Level Terrain. The MTO is completed and approved by the Medical Provider following an individualized evaluation and is then provided to Classification staff and the ADA Coordinators. In addition, as a general matter, incarcerated persons who require level terrain are assigned a Lower Tier chrono, per subsection (d).

A review of the Disability Accommodations Request and ADA grievances reveals no requests for level-terrain accommodations. Additionally, during interviews with incarcerated persons, there were no complaints regarding the path-of-travel accommodations.

The Expert finds that the County has a process in place to identify a disabled incarcerated person's need for Level Terrain and document the accommodation needs in the current ADA Tracking System.

5.H.2. *People with disabilities shall be housed in the Jail consistent with their individual security classification. Classification staff shall not place prisoners with disabilities in: (a) inappropriate security classifications because no ADA-accessible cells or beds are available; (b) designated medical areas unless the prisoner is currently receiving medical care requiring such placement; or (c) any location that does not offer the same or equivalent programs, services, or activities as facilities where they would be housed absent a disability.*

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County presently houses people with disabilities consistent with their security classification regardless of disability at the Northern Branch Jail and Main Jail. However, pursuant to the parties' August 2023 Stipulation, incarcerated persons with mobility disabilities at the Main Jail are housed in South Dorm. During COVID-19 outbreaks or quarantine, the County ensures that inmates with disabilities are moved to accessible housing at Northern Branch Jail, if medically indicated. As part of the proposed IRC remodel, ADA compliant cells will be included in each housing unit. All locations within the Main Jail offer the same or equivalent programs, services, or activities as those absent a disability in such facility. The County is proceeding with remodel of the Inmate Receiving Center of the Main Jail, which will address accessibility requirements at the facility. This remodel is scheduled to be complete by Summer of 2027. Full compliance with this provision will likely follow remodel, reconfiguration, renovation, or new construction of the facilities as contemplated in paragraph 10 of the Stipulated Judgement.

Analysis/Observations

The Santa Barbara County Sheriff's Office Custody Operations – Policy and Procedures Manual 301 Inmate Classification states, "Inmates shall be housed in the least restrictive setting necessary to ensure their own safety, as well as the safety of staff and other inmates. An inmate shall not be housed in more restrictive settings, including Restrictive Housing, based on gender identity, mental illness, or any other disability.

Classification assignments and housing decisions shall be supported by all available information, such as:

- Prior criminal history;
- Past behavior in custody;
- Sophistication of crime(s);
- Length of sentence;
- Potential for violent or assaultive behavior;
- Medical and/or mental health status, when appropriate, ADA requirements;
- Age; and
- Any other information that will provide for the safety of staff and other inmates."

During the onsite monitoring tour, the Expert noted that incarcerated people with disabilities were housed in the following locations:

Main Jail

- Central Module-01
- Central Module-04
- East Module-01
- East Module-04
- East Module-08

- East-Module 24
- IRC-100
- IRC-200
- IRC-300
- IRC-400
- Northwest-A
- Northwest-B
- Northwest-D
- Northwest Isolation
- South Dorm
- West Module-04
- West Module-06
- West Module-08
- West Module-10
- West Module-13
- West Module-16

Northern Branch Jail

- Module-A
- Module-B
- Module-C
- Module-D
- Module-E
- Module-F
- Module-G
- Module-J
- Module-M

The County presently houses people with disabilities consistent with their security classification at the NBJ. The County does so at the MJ, subject to the facility's structural constraints. Currently, the only accessible housing at the MJ is in the South Dorm.

The County has expanded worker opportunities and the Sheriff's Treatment Program (STP). However, additional steps are needed, such as providing access to community-based education/programming. Additionally, although the MJ Northwest Isolation cells have been deactivated from housing incarcerated persons with MH disabilities, the County, at times, continues to house the mental health population in the MJ NE Isolation cells, where they have far less access to yard, dayroom, in-person programs, and in-person education classes. Since the last site visit, the County has not provided the Expert with information regarding expanded program opportunities that have been implemented.

Note: In a Memorandum (ADA Housing Directive) dated December 13, 2023, a Custody Commander issued a directive to the Custody Classification as follows:

"DIRECTIVE:

Effective immediately, Incarcerated Persons housed in the Sheriff's Jail Facilities with ADA accessible housing needs will only be housed at the Northern Branch Jail or SDORM in the Main Jail. If there is a question about an Incarcerated Persons ADA accessible housing need, you must contact the ADA Coordinator for clarification or direction prior to housing the individual.

RATIONALE:

Disability Accessibility Requirements. Defendants will cease housing class members with ADA-accessible housing needs in any of the housing units in West, East, Central, Back Central, and Northwest and will ensure that all class members with ADA-accessible housing needs are provided accessible housing and equitable access to the Jail's programs, services, and activities (see Remedial Plan Section V.H (Housing Placements). (p. 12)"

At the time the directive was issued, class members housed in the MJ housing units in West, East, Central, Back Central, and Northwest could elect to remain at the MJ by signing a waiver. During the on-site tour, the Expert confirmed that class members with ADA-accessible housing needs were not housed in the MJ housing units in West, East, Central, Back Central, and Northwest. However, the ADA Tracker List for 8/9/25 reflects that an incarcerated person who requires housing in an ADA cell was assigned to IRC-200 cell 213 (when the Expert attempted to interview him, the County reported that he had been transferred to the NBJ). Additionally, during the incarcerated person interviews, an incarcerated person who has a mobility disability stated he was housed at MJ restrictive housing for one (1) week with no accommodations (in cell and shower). Another incarcerated person housed at the NBJ Mod A reported that the shower was offline for 2 weeks, and he had to walk up the stairs to shower.

As stated above, the County presently houses people with disabilities consistent with their security classification at the NBJ. The County does so at MJ, subject to the structural constraints of that facility. However, the placement of incarcerated persons with mental health disabilities in the NE Isolation cells amounts to placement in higher security settings due to the incarcerated person's disability. The County reported it does not place incarcerated persons in this housing unit based on mental health disabilities. This placement is for a separate reason. Incarcerated persons placed here receive mental health clearance. In addition, there is a weekly review of restrictive housing placement by Medical, ADA, and Custody teams to ensure that there is a basis for placing the individuals there.

During the incarcerated person interviews, there were no complaints that the incarcerated persons were not housed in areas consistent with their classification. If the MJ population requires additional ADA housing, the County works within the

facility's structural barriers to provide accommodations for incarcerated persons with disabilities who cannot be housed in ADA-accessible cells.

The County presently houses people with disabilities consistent with their security classification, regardless of disability. However, pursuant to the parties' August 2023 Stipulation, incarcerated persons with mobility disabilities at the Main Jail are housed in South Dorm. The County ensures that incarcerated persons with disabilities are moved to accessible housing at NBJ, if medically indicated. As part of the proposed IRC remodel, ADA-compliant cells will be included in each housing unit as the County proceeds with the remodel, addressing accessibility requirements at the MJ. This remodel is scheduled to be complete by the Summer of 2027.

There is no specific medical housing area for incarcerated people at the MJ. South Dorm is primarily used to house incarcerated people who may require greater access to medical staff. However, MJ South Dorm is not considered/classified as medical housing. MJ South Dorm serves as a de facto Medical unit that houses incarcerated persons with disabilities, even though they are not receiving medical care that would warrant medical unit placement. The MJ South Dorm may be the best MJ option available for some class members with disabilities at present, but the current practice does not comply with the Remedial Plan or with 28 CFR 35.152. In accordance with the parties' August 2023 stipulation, the County may continue to house ADA inmates in South Dorm, pending completion of facility improvement plans across the system.

The NBJ has a medical housing area, and during the monitoring tour, there were three (3) incarcerated persons with a disability housed in the medical area (NBJ Mod M) due to medical treatment necessity.

The Expert recognizes that, due to structural building issues, compliance with this requirement will depend on the completion of the proposed MJ renovation, remodel, or construction at the NBJ.

As stated above, except for the MJ South Dorm, incarcerated people with disabilities are housed in areas consistent with their classification case factors. The MJ does not provide programming opportunities such as those that are offered at the NBJ (Alan Hancock College) and the Northwest Isolation Workers Housing Unit (Santa Barbara City College), and mobility for incarcerated persons housed in the MJ Northwest BHU's and MJ South Dorm and South Tank is only provided with remote programming opportunities. The incarcerated persons housed in the BHUs do not have access to other in-person programs that are available in other housing locations. Because the BHUs house people with serious mental health needs, it is essential that this group has equal access to programs, including community-based programming. For modules housing people with mental health disabilities (Northwest) and medical/physical disabilities (South Dorm), it is essential that this group have equal access to programs and community-based programming.

The County must continue to explore ways to expand community-based program opportunities to reach disabled incarcerated persons who are housed in the MJ, as well as units where persons with mental health disabilities are clustered (NBJ's Modules J and K, MJ's Northwest Modules A, C, D).

The County must ensure that the forthcoming renovations at the MJ IRC provide disabled incarcerated persons with equal access to the Jail's programs, services, and activities.

To reach substantial compliance with provision 5.H.2, the County must:

- Finalize the remodel of the MJ IRC and construction at the NBJ.

5. I. Visitation

5.I.1. The County shall ensure that family/personal and professional visitation areas are accessible for people with disabilities and visitors.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports the Northern Branch Jail is in compliance with this provision. At the Main Jail, incarcerated persons that require accessible visitation are escorted to an IRC professional visitation booth that is accessible. As a long-term solution, the County is proceeding with remodel of the Inmate Receiving Center of the Main Jail, which will address accessibility requirements including visitation space. This remodel is scheduled to be complete by Summer of 2027.

Analysis/Observations:

The County conducts family/personal visits at the NBJ via video visiting and professional visits in the professional visiting booths unless a video visit is requested. The video-visiting areas at the NBJ are accessible to visitors and incarcerated persons.

The County conducts all visits (family/friends/professional) in person at the MJ. The Expert toured the visiting areas and found that there are 81 visiting stations that do not have a permanent stool and can be accessed by incarcerated people with disabilities.

The County reports that after the IRC remodel, each housing unit will have a visitation room that allows video visits. The County is remodeling a separate non-contact visitation booth for ADA compliance to accommodate in-person visits. This booth will be at a location apart from the four visitation booths at the IRC.

To reach substantial compliance with provision 5.I.1, the County must:

- Finalize the remodel of the Inmate Receiving Center of the Main Jail, and ensure accessible visitation is provided at that facility.

5.I.2. The County shall perform an individualized assessment as needed and shall ensure that people with disabilities have full access to visitation at the Jail.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Substantial Compliance

Pursuant to Paragraph 52 of the Remedial Plan, the County has been in substantial compliance with this provision and have maintained such substantial compliance for a period of at least six (6) months. Based on this, the parties conferred, and Class Counsel has no objection to the County's request and has agreed to the discontinuation of monitoring for this provision.

County Response:

The County reports that the Expert found the County in substantial compliance with this provision. Monitoring is discontinued pursuant to paragraph 52 of the Remedial Plan.

Analysis/Observations

The Wellpath MTO includes the documentation of approval for accommodations that incarcerated people with disabilities need to access the Jail's programs, services, and activities. After the individualized evaluation is conducted, the MTO is provided to custody staff.

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

As the County works to renovate the SBJ facility (including to meet ADA/accessibility requirements), it is essential that accessibility deficiencies in the visiting area(s) be addressed. In the interim, there must be a process in place to consistently accommodate people with mobility disabilities (including wheelchair users) who need an alternative setting to visit in an accessible setting.

5. J. Access to Programs, Services, and Activities

5.J.1. The County shall ensure people with disabilities, including those housed in specialty health care units, have equal access to programs, services, and activities available to similarly situated people without disabilities, consistent with their health and security needs. The County shall ensure that staff provide appropriate assistance to people with disabilities as needed to ensure equal access to programs, services, and activities

provided at the Jail. Such programs, services, and activities include, but are not limited to:

a) Educational, vocational, reentry, and substance abuse programs
b) Work Assignments
c) Dayroom and other out-of-cell time
d) Outdoor recreation (including accessible exercise equipment)
e) Structured programming (including in-cell activities)
f) Showers
g) Telephones and/or videophones
h) Reading materials (including easy reading, large print books, and other materials accessible to people with a vision-related disability)
i) Religious services
j) Family/personal and professional visits
k) Medical, mental health, and dental services and treatment

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County offers inmates tablets and STP programming, a partnership with Santa Barbara City College. These programs are available to all individuals regardless of disability. The County has outdoor exercise equipment, audiobooks, and magnifiers to satisfy the requirements of this provision. The County currently provides auxiliary aids, large print, and easy-reading materials during programs for individuals needing those accommodations. The County obtained pocket talkers per the ADA Expert's prior recommendation. The County also offers work assignments to ADA inmates and provides work accommodations for this population. The County also expanded work opportunities for incarcerated persons housed in South Dorm at the Main Jail. The County has completed its inmate worker job description and has been approved by the ADA Expert. The County provides program facilitators with a list of inmates with disabilities and their accommodation needs. The County currently provides equal access to the programs included in this provision; however, per the ADA Expert's recommendations, the County is working to expand educational and community-based program opportunities in the BHUs at both facilities. Full compliance with this provision will likely require remodel, reconfiguration, renovation, or new construction of the facilities as contemplated in paragraph 10 of the Stipulated Judgment. The County is proceeding with the remodel of the Inmate Receiving Center of the Main Jail, which will address accessibility requirements. This remodel is scheduled to be complete by Summer of 2027.

Effective Communication ADA tracking protocol is in place as follows:

1. Each Programs office prints and posts the Daily ADA Tracker and checks student rosters against the "Effective Communication" ADA needs, where relevant.
2. Class/Group Sign-In sheets include a column designated "ADA" where Facilitators/Counselors would write place a checkmark for enrolled IPs who with "Effective Communication" ADA needs that are being met. These sign-in sheets are scanned and placed in DRC "Box".
3. STP Programs Correctional Counselors write Facilitator Notes in JMS in the Programs Tab for individual participants with "Effective Communication" ADA needs, and how these were accommodated/met during the class.

When/If incarcerated persons inform facilitators that they are having difficulty with seeing the reading materials clearly, a small plastic magnifier can be provided and used during class time and then returned to the instructor for use in the subsequent classes with those students.

Analysis/Observations:

The July 2026 Northern Branch Jail (NJB) Programs Calendar reflects the following types of programs that are available to incarcerated persons in the following locations:

- Chaplain Services/Bible Studies – All Mods
- Sheriff Treatment Program – Mods A and C
- Alan Hancock College – Mods A, C, D, E, and G
- Therapeutic Reentry Interventions for Vital Employment Mods D E and G
- AA/NA (Women/Men) – All Mods

F Unit BHU

- Planned Parenthood Workshop

The Southern Branch Programs Calendar (June 2026) reflects the following programs in various Mods:

- STP - West 6 and 16, and BHU (A, C, D).
- Book Club – East 23, Back Central 1, Northwest Isolation
- AA – Central 1 and 4, West 13, East 1, 6, and 23
- Therapy Dogs – BHU (A, C, D)
- Planned Parenthood Workshops – West 10
- Yoga – BHU C
- BHU Program (Various Facilitators) NW-A-BHU, NW-C BHU, and NW-D.BHU,
- Santa Barbara Community College - Northwest Isolation

The MJ Program staff reported that the EDOVO Tablet Program is also available to all incarcerated persons, including those who do not participate in the programs listed above.

The County offers the STP in all modules on a rotating basis, except Mods B and M at the NBJ and South Tank at the MJ. The STP and Mental Health programs are also

being provided in the MJ BHUs (NW A-D Mods) and NBJ Mod F. In a review of the MJ/NBJ Programs Calendar/Schedule, mobility-disabled incarcerated persons housed at the NBJ (Mods B, F, G, and M) do not have equal access to the programs that are available to similarly situated people without disabilities (AHC, THRIVE). Incarcerated persons housed in the BHUs (NBJ Mods J and K and MJ NW Mods A-D) have access to in-person STP. The MJ does not provide programming opportunities such as those that are offered at the NBJ (AHC) and the Northwest Isolation Workers Housing Unit (Santa Barbara City College), and mobility incarcerated persons housed in the MJ Northwest BHU's and MJ South Dorm are only provided with remote programming opportunities. The incarcerated persons housed in the BHUs do not have access to other in-person programs that are available in other housing locations. Because the BHUs house people with serious mental health needs, it is essential that this group have equal access to programs, including community-based programming. As these modules primarily house people with serious mental health disabilities (Northwest) and medical/physical disabilities (South Dorm), it is essential that this group have equal access to programs including community-based programming.

The County must explore ways to expand community-based program opportunities to reach disabled incarcerated persons who are housed in the MJ, as well as units where persons with mental health disabilities are clustered (NBJ's Modules J and K, MJ's Northwest Modules A and D).

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

Access to work assignments is covered in detail in section 5.J.3. below.

All incarcerated people with disabilities have equal access to the dayroom and other out-of-cell time. Other portions of the *Murray v. Santa Barbara County* Remedial Plan address access to the dayroom for all incarcerated persons housed in the SBCJ.

Accessible exercise equipment is now available in all of the MJ and NBJ recreation yards.

Additionally, during the previous onsite monitoring tour, the Expert noted that the two accessible MJ yards did not have accessible seating for disabled incarcerated persons. The Expert (Sabot) accessibility Expert will need to access the yards to assess and confirm compliance with accessibility standards as remedial steps are taken. These accessibility improvements cannot be deferred during the period of renovations at MJ.

The program facilitators stated they continue to receive a list of incarcerated people with disabilities and their accommodation needs. They also reported that the accommodations they provide to incarcerated people with disabilities include reading glasses, assistance with understanding program content, and an SLI. Other

accommodations (auxiliary aids, large print, magnifiers) are available for incarcerated people with disabilities in coordination with the ADA Coordinators.

The South Dorm shower is ADA accessible. The County has also included the IRC shower modifications in the accessibility construction plan. There are accessible showers in every housing Module at the NBJ.

The Expert addresses access to videophones in Section 5.N.8 of the report. The County provides disabled incarcerated persons with access to telephone amplifiers, TTYs, and videophones. There were no complaints during the incarcerated person interviews that incarcerated persons are not being provided with accommodations in accessing the telephones and/or videophones.

During the monitoring tour, the Expert noted that easy-to-read, large-print books and other materials are available and accessible to people with vision-related disabilities. The Expert noted that audiobooks are also available if an incarcerated person with a vision disability requires the accommodation. The County previously informed the Expert that the reading material on the tablets is accessible for incarcerated persons with vision disabilities. The Expert confirmed that the text on the tablets can be enlarged.

The Santa Barbara North Jail Non-Denominational Services and Santa Barbara County Jail Chaplain Services reflect that religious services are provided in all Mods except the MJ South Dorm, NW Mods A-D, and NBJ Mod K. Additionally, religious services are only provided one (1) day of the Month in NBJ Mod M. The result is that people with mental health and other disabilities do not have equal access to religious programming.

Incarcerated people who are deaf and whose preferred/primary method of communication is ASL/SLI must be provided with an SLI during the religious program. There were no cases to review where an SLI/VRI was provided during religious services. The County established a contract with "Purple Communications" on 1/11/23 for on-demand sign language interpreting services. In addition, incarcerated persons who are hard of hearing are provided with an amplification device, "PocketTalker," to use during the religious service. The Expert will continue to monitor this in detail during the next monitoring tour.

All medical, mental health, and dental services are accessible to incarcerated people with disabilities. The Architectural Expert will review the physical access to the treatment rooms in more detail. The County must ensure that disabled incarcerated persons who require assistance with reading and writing are provided assistance with submitting sick call slips.

To reach substantial compliance with provision 5.J.1, the County must:

- Ensure people with disabilities, including those housed in specialty health care units, have equal access to programs, services, and activities available to similarly situated people without disabilities, consistent with their health and

security needs. This includes religious programs and community based educational opportunities.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice to the Expert.

5.J.2. The County's policy shall include the provision of assistance in reading or scribing legal documents, sick call requests, grievances, documents related to disciplinary procedures, and documents related to health care encounters.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County has completed a comprehensive ADA training curriculum that incorporates the training requirements of the Remedial Plan, including this provision. This ADA training has been reviewed and approved by the ADA Expert and Class Counsel. The County anticipates completing the initial training in October of this year and completing this training in the next six months.

Analysis/Observations

Wellpath Policy HCD-110_F-09 Effective Communication – Santa Barbara, CA includes specific directives for medical staff to provide reading and writing/scribing medical-related documents to incarcerated people with disabilities.

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

The Expert interviewed four (4) incarcerated persons who require assistance with reading and writing (one blind/low vision and three intellectually/developmentally disabled). Two (2) reported that staff does not offer or provide assistance, and they must rely on other incarcerated persons.

To reach substantial compliance with provision 5.J.2, the County must:
- Provide assistance in reading or scribing legal documents, sick call requests, grievances, documents related to disciplinary procedures, and documents related to health care encounters.
- Ensure staff offers assistance and document when staff offer assistance and provide reading and writing assistance.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice to the Expert.

5.J.3. The County shall ensure equitable work opportunities for people with disabilities, including by ensuring (a) clear job duty statements, with essential functions and specific criteria, for each worker position; and (b) that health care and other relevant staff conduct an individualized assessment to identify work duty restrictions and/or physical limitations to facilitate appropriate work/industry assignments, to ensure reasonable accommodations, and to prevent improper exclusions from work opportunities.

Compliance Rating: Substantial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in compliance with the stipulation.

Analysis/Observations

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

To measure compliance with this requirement, the Expert requested a list of all available work assignments/positions for incarcerated persons, the housing locations of workers, and a list of all incarcerated persons currently assigned to work positions. The County produced the MJ and NBJ Worker Lists. The NBJ Worker List reflects 33 worker positions, and the MJ Worker Lists (Laundry, Supply Room, Northwest Dock, Printshop, and Kitchen Crew) reflect 29 worker positions. The County has also established a worker program in the MJ South Dorm, and the Inmate Work Vocational Matrix includes positions for Latrine Detail, Shower Detail, and Dayroom Detail.

Disabled incarcerated persons in the Jails are provided work opportunities. During ADA Coordinator interviews with people with disabilities, the ADA staff advise the incarcerated person that they are eligible for work opportunities if they meet the classification criteria. It is the County's position that SBCJ does not discriminate against individuals with disabilities in work assignments. The County makes every reasonable attempt to accommodate incarcerated persons in work assignments per the ADA.

The County produced an Excel Spreadsheet, "Inmate Work Vocational Matrix Final." The spreadsheet includes:

- Job Titles
- Physical Requirements
    - Mobility
    - Lifting
- Medical & MH Consideration and/or Disqualifiers Wellpath (Case-by-case basis)
- Training Requirements

- Classification Considerations & Disqualifiers
- Charge Disqualifiers

The *Murray v. Santa Barbara County* Remedial Plan requires that job duty statements be clear and include the essential functions and specific criteria for each position. Although the "Inmate Work Vocational Matrix Final" includes essential functions for the worker positions. The Medical & MH Consideration includes medical conditions such as "chronic knee, leg, or back problems," where staff must evaluate and consider the disabled incarcerated person's assignment to these job positions on a case-by-case basis. However, medical staff reported that all disabled incarcerated persons are eligible to work and they are not denied based on their disability.

In cases where the incarcerated person has a qualifying disability, the County must provide the incarcerated person with reasonable accommodations and the opportunity to be assigned to work if they can perform the essential functions of the work position. Some of the positions are such that disabled incarcerated persons with "chronic knee, leg, or back problems" could be assigned to work with modified duties and reasonable accommodations include:

- Kitchen Crew
  - Serving trays and/or preparing lunches, etc., in a seated position
- Laundry Crew
  - Folding and sorting clothes in a seated position
- Lobby Crew
  - Intermittent rest periods
- Paint Crew
  - Intermittent rest periods
- Landscaping Crew
  - Intermittent rest periods
- Welder
  - Intermittent rest periods
- Yard Clean-Up
  - Intermittent rest periods
- Latrine Detail
  - Intermittent rest periods
- Shower Detail
  - Intermittent rest periods
- Dayroom Detail
  - Wiping tables and walls, intermittent rest periods
- Paint Shop Crew
  - Intermittent rest periods.

The Initial Health History and Physical Exam (NCCHC), conducted within 14 days of a person's arrival at the Jail, includes a checkbox for "Work Restrictions." The MTO for Patient Housing includes a section for medical staff to document Physical Limitations.

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

Medical staff reported that all incarcerated persons are reviewed for worker clearance within 10 days of arrival by a registered nurse (Health Appraisal Nurse). If no restrictions are identified, the incarcerated person is cleared for work duty. If restrictions are identified, the case is referred to a medical provider. The medical provider evaluates the incarcerated person and either clears them for work, with or without restrictions, or does not approve them for work duty. The Worker Clearance form includes the following questions that are applicable to physical disabilities:

- Back problems?
- Presently being treated for a chronic illness?
- Any physical limitations to prolonged standing or lifting?
- Restrictions to activity?

The Worker Clearance form includes the following:

- This patient has been examined by health care staff for consideration for a Patient worker
  - Yes
  - No
- Patient was
  - Approved
  - Denied
  - Other
- Approved for
  - Food Services
  - Laundry Services
  - Other

In addition, the Worker Clearance form includes a Food Services and Laundry worker agreement.

The County produced Inmate Worker Observation Forms (26) for 18 incarcerated workers for the months of February 2026 to May 2026. The forms are completed by ADA staff and ask incarcerated workers about work restrictions and whether they require any accommodations. The County also produced historical worker positions for the NBJ Laundry and NBJ Kitchen that reflect 50 NBJ laundry positions, 10 of which were filled by ADA incarcerated persons, and 55 NBJ kitchen workers, 21 were filled by ADA incarcerated persons. Additionally, the County reported that during the rating period, nine (9) ADA incarcerated persons were assigned to the SBJ Laundry and 14 were assigned to the SBJ kitchen.

5. K. Health Care Appliances, Assistive Devices, Durable Medical Equipment

5.K.1. The County shall establish a written policy to ensure the timely provision of safe and operational HCA/AD/DME to people with a disability based on an individualized assessment by medical staff, with a process for timely repair and replacement of such devices as needed.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.K.2. A person's request for a particular device or other accommodation shall be given primary consideration and shall be granted unless the request is unreasonable for specific, articulated reasons allowable under the ADA, or unless other effective accommodations are available.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County and Wellpath collaborate to ensure that this provision is complete. Wellpath is in the process of incorporating the requirements of this provision into its Durable Medical Equipment Medical Supply Policy (F-10). The County completed a comprehensive ADA training curriculum that incorporates all of the training requirements of the Remedial Plan, including this provision. This ADA training has been reviewed and approved by the ADA Expert and Class Counsel. The County will initiate training for all staff beginning in October. The County anticipates completing this provision in the next three months.

Analysis/Observations

Proposed Wellpath Policy CMP-14 Durable Medical Equipment Medical Supply – Santa Barbara, CA, states, "Durable Medical Equipment and medical supplies will be provided to patients as medically necessary and in a timely manner when the health

of the patient would otherwise be adversely affected and/or to ensure the patients have equal access to facility programs, services, or activities as determined by the practitioner or dentist."

Additionally, when medical staff determines that an assistive device is not medically necessary, the ADA coordinator conducts an individualized assessment and, in some cases, issues the assistive device as an accommodation.

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

The ADA Coordinator may, at times, provide incarcerated persons with HCA/AD/DME on an interim basis upon request. This is reflected in the ADA Tracker.

During the incarcerated person interviews, the following issues were reported:

- An incarcerated person with a prescribed continuous glucose monitor (CGM) as part of his diabetes management plan reported that he has not been receiving timely replacement sensors (each of which lasts approximately 2 weeks), causing significant gaps in the provision of sensors and CGM monitoring.
- An incarcerated person reported that in early February 2026, he was returned to NBJ from an outside hospital, *in* a wheelchair and transported in the ADA van, and upon his return to the jail, the wheelchair was taken from him and no alternative devices were provided. He reported that he was without any assistive device for approximately 5 days, after which the ADA coordinator provided him a cane. He also reported that he was approved for a left knee brace several weeks ago and was still awaiting its delivery.
- An incarcerated person reported he initially had a wheelchair MTO through April 17, 2026, and that the orthopedic specialist evaluated him recently and ordered that he continue to use a wheelchair to avoid any load bearing on his left while things continue to heal. He has a walker; however, he reported that the walker is an insufficient accommodation for him.
- An incarcerated person reported that he has requested a specialized kind of insole to accommodate his specific foot condition (reported as sesamoiditis). He reported that the arch supports provided to him do not meet his specific needs.
    - The County/WellPath response appears to lack adequate explanation (i.e., "3/31/26 requested insoles for Sesamoiditis, seen 4/3/2026, per provider this was denied.").
- An incarcerated person reported that he was seen by an eye doctor approximately one (1) month ago and received a new glasses prescription. However, he is still waiting to receive the new glasses.
- An incarcerated person has a knee brace and orthotic shoes (MTO on file), according to the ADA tracker document; however, he reported he has not been

provided a knee brace. He also reported that he had orthotic shoes at NBJ, but they were taken when he was transferred to SBJ, and they have not been returned to him.

To reach substantial compliance with provision 5.K.2, the County must:

- Ensure policy is put in place that gives primary consideration to the incarcerated person's request for a particular device or other accommodation, and that the request be granted unless the request is unreasonable for specific, articulated reasons allowable under the ADA or unless other effective accommodations are available.
- In cases where a device is deemed to be "medically necessary," there must be due consideration of the accommodation based on meaningful access standards.
- If a device is requested and would help facilitate the incarcerated person's access to programs, services, or activities by accommodating a disability, it should generally be provided unless it is unreasonable for clear and articulated reasons.
- Ensure staff is trained on *Murray* Remedial Plan requirements.

5.K.3. The County shall allow people to retain personal HCAs/ADs/DME (including mobility devices, glasses, and hearing aids) unless there is an individualized determination that doing so would create an articulated safety or security risk.

a) Where Jail staff determine it is necessary to remove personal HCA/AD/DME for security reasons, the County shall provide an equivalent Jail-issued device unless custody staff, with ADA Coordinator approval, determine and document, based on an individualized assessment, that the device constitutes a risk of bodily harm or threatens the security of the facility.

b) If such a determination is made, the ADA Coordinator shall document the decision and reasons for it and shall consult with medical staff to determine an appropriate alternative accommodation.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County presently meets the requirements of this provision and finalized the Safety and Security Assessment Form that documents the individualized determination required by this provision. Per the ADA Expert's recommendation, the County will provide training to all deputies to demonstrate compliance with this provision. The County completed a comprehensive ADA training curriculum that incorporates all of the training requirements of the Remedial Plan, including this provision. The ADA training has been reviewed and approved by the ADA Expert and Class Counsel. The County

will initiate training to all staff beginning in October. The County anticipates completing this provision in the next six months.

Analysis/Observations

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

The "Safety and Security Assessment Form" has been finalized; however, all staff has not completed the training.

During the previous monitoring tour, the Expert noted metal supports had been removed from numerous (approximately ten) wrist braces. The removal of metal supports from a wrist brace may make the device less effective or entirely ineffective as an accommodation for an incarcerated person who requires the support of the metal within the brace, In cases where there is a legitimate security concern in allowing a wrist brace with metal supports that can be removed from the brace and misused by incarcerated persons, the County can modify the device so the metal supports are secured within the brace by sewing the brace to not allow for easy removal of the metal. Each case must be based on an individualized assessment, in consultation with medical staff, including providing an alternative device, such as a brace with appropriate supports that meet the accommodation needs of the incarcerated person and County's safety concerns. Where a legitimate security concern with a device is identified, the County and Wellpath must take steps to ensure provision of an appropriate alternative that accommodates the individual.

The Expert also noted that one of the metal supports had been fashioned into a weapon. However, staff reported that "Safety and Security Assessment Forms" had not been completed, and that the cases had not been referred to the ADA Coordinator for approval and to medical staff for determination of an alternate accommodation. The NBJ intake deputy reported that if an incarcerated person arrived with a brace with removable metal, the brace would be removed.

The County did not provide documentation of any cases in which staff determined that it was necessary to remove a personal HCA/AD/DME for security reasons.

Additionally, the County has finalized the "Safety and Security Assessment Form" that will document the individualized determination.

To reach substantial compliance with provision 5.K.3, the County must:

- Ensure the Safety and Security Assessment Form is used for cases where a personal HCA/AD/DME is not approved for security reasons.
- Ensure the ADA Coordinator consults with medical staff to determine appropriate alternative accommodations.
- Ensure staff is trained on *Murray* Remedial Plan requirements.

- Provide proof-of-practice to the Expert.

5.K.4. The County shall implement a written policy governing the release of people who need assistive devices.

a) The County will ensure that any personal mobility device belonging to a person is returned prior to release.

b) If a person does not have a personal mobility device, but is ambulatory with the assistance of a cane, crutch, or walker, the prisoner will be permitted to retain such device that was used while in custody upon release, or will be provided a comparable device, upon release.

c) If a person who is due for release requires a wheelchair but does not have a personal wheelchair, Jail staff shall coordinate with the prisoner, family or friends, and other County agencies as needed to secure a wheelchair or take other steps to address the individual's needs upon release. The County shall document this process in the ADA Tracking System for purposes of individual tracking and quality assurance.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in full compliance with this stipulation as reflected in the SBSO Custody Operations Policy and Procedures manual. The ADA Coordinators have trained property staff on the proper procedures to release inmates with their personal accommodations. Proof of practice can be viewed within the ADA Tracking System (Notes).

Analysis/Observations

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

The Expert toured the property rooms and found that no personal mobility devices were being stored in the property rooms.

The County produced SBSO Santa Barbara Sheriff Inmate History-Inmate Notes ADA-Accommodation At Release reports. The MJ report reflects that five (5) incarcerated persons were released with assistive devices and/or orthotic shoes. The NBJ report indicates that 16 incarcerated persons were released with personal or county-issued assistive devices, orthotic shoes, and compression socks.

The Expert identified 16 random cases of incarcerated persons with prescribed assistive devices who had been released from custody and reviewed the SBSO Santa

Barbara Sheriff Inmate History-Inmate Notes ADA-Accommodation At Release reports to determine whether the cases were reflected in the reports. Based on the review, the Expert found that 14 of the cases were not reflected in the reports.

The Custody Support Technicians at the NBJ, who are assigned to property and release, stated they identify incarcerated persons with prescribed HCA/AD/DME who are being released by reviewing the ATIMS Property Release queue and the ADA Flags. They further indicated that the incarcerated person would be released with the county-issued HCA/AD/DME. However, the Custody Support Technicians assigned to the MJ Property Room have not been trained on the *Murray v. Santa Barbara County* Remedial Plan requirement.

The Custody Support Technicians that were assigned to property and release stated that in cases where an incarcerated person is due for release and requires a wheelchair but does not have a personal wheelchair, the County coordinates with the prisoner, family or friends, and other County agencies as needed to secure a wheelchair and/or takes other steps to address the individual's needs upon release.

The policy has been implemented; however, staff are currently being trained.

The Expert's review of the SBSO Santa Barbara Sheriff Inmate History-Inmate Notes ADA-Accommodation At Release report found that in 14 of 16 cases randomly selected, staff did not document the information in the ADA Tracking System. d.

To reach substantial compliance with provision 5.K.4, the County must:

- Ensure that incarcerated persons who require assistive devices are released with assistive devices.
- Ensure that any personal mobility device belonging to an incarcerated person is returned prior to release.
- Ensure incarcerated persons who do not have a personal mobility device, but are ambulatory with the assistance of a cane, crutch, or walker, etc., are allowed to retain the device that was used while in custody upon release, or provided a comparable device, upon release.
- Ensure staff documents the process in the ADA Tracking System for individual tracking and quality assurance.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice to the Expert.

5. L. Transportation

5.L.1. The County shall provide reasonable accommodations for people with disabilities when they are in transit, including during transport between facilities, to and from court, or to and from outside health care services.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Discontinuation of Monitoring

Analysis/Observations

The Expert had previously found the County in substantial compliance and, pursuant to Paragraph 52, the Transportation provisions 5. L.1 and 5.L.3 had been rated as discontinued from monitoring. Additionally, on May 4, 2026, the court ordered, consistent with the parties' stipulation, that monitoring of Section V.L provisions be suspended. *Murray* Docket No. 106.

Pursuant to paragraph 53 of the Stipulated Judgment, on June 15, 2026, the plaintiffs notified the County that it was their position that the County was no longer in substantial compliance with Transportation provisions 5.L.1 and 5.L.3, which had previously been found to be in substantial compliance and as to which monitoring had been suspended.

Detailed below is a summary of the plaintiff's position. During this month's Sixth Round ADA/Disability monitoring visit (June 8-11, 2026), several concerns surfaced regarding the status of implementation of Section V.L. For example, the following four class members with mobility disabilities credibly reported a denial of transportation-related accommodations, some on multiple occasions:

- Incarcerated person housed at the SBJ – ADA Van is listed on the ADA tracker. Per the Expert's interview, the incarcerated person reported that he was transported in a non-accessible vehicle.
- Incarcerated person housed at the NBJ – Uses a wheelchair full-time. ADA Van is listed on the ADA tracker. The incarcerated person reported that during his most recent three (3) transports (in 2026), he was transported in a van without wheelchair accessibility two (2) times and was transported in the ADA van once.
    - County response - He was asked about riding in a regular transport van and agreed that he was able to do so. Unfortunately, at that time, we did not have the ADA van refusal forms that are now available.
- Incarcerated person housed at the NBJ – Uses wheelchair full-time. ADA Van is listed on the ADA tracker. The incarcerated person reported that he had been transported in the non-ADA van and that it is very difficult for him to get on and off the non-ADA van.
    - On the date of this court transport, the ADA van was being used to pick up Inmate XXXX from Via Maria Hospital, where the ADA van had been transported the previous night.
- Incarcerated person housed at the NBJ – Mobility disability. "Van only" is listed on the ADA tracker. He reported that approximately half the time, he is made to take the normal bus rather than the van.
    - County response - He was asked about riding in a regular transport van and agreed that he was able to do so. Unfortunately, at that time, we did not have the ADA van refusal forms that are now available.

Plaintiffs' counsel also noted examples of the ADA tracker's inconsistency in identifying transportation-related disability accommodation needs.

Plaintiffs' counsel requested a written response from Defendants within 30 days, *i.e.*, no later than July 15, 2026. Plaintiffs' counsel requested the findings of any SBSO investigation on these issues. Plaintiffs' counsel also requested any corrective action plan(s) (e.g., staff training, tracking improvement, quality assurance procedures/oversight, etc.) that the County develops on this topic.

In response to the plaintiffs' Paragraph 53 notice, on July 15, 2026, the County agreed that it is no longer in substantial compliance with Remedial Plan section V.L.1. The County stated that "Because the County did not regularly track ADA vehicle transportation accommodations or refusals, the County is unable to confirm or disprove whether the incarcerated persons listed in the email below have been denied a transportation-related accommodation. Nevertheless, the County believes that some incarcerated persons were not provided transportation in an ADA vehicle."

The County also listed the following corrective actions:

- Transportation staff has completed ADA training.
- Custody and medical staff will meet bi-weekly to assess whether the appropriate ADA designations have been made in the ADA tracker—i.e., who needs a van only versus an ADA van.
- The transportation unit is using ADA refusal accommodation to document refusals. These forms are uploaded to Box and will be regularly reviewed by the ADA coordinator.
- The transportation unit is using a daily log that shows when ADA individuals are being transported and the vehicle that was utilized. The log also has a section where individuals sign if they refuse their ADA vehicle accommodation. These forms are uploaded to Box and will be regularly reviewed by the ADA coordinator.

Based on the County's response, "On the date of this court transport, the ADA van was being used to pick up Inmate XXXX from Via Maria Hospital", it is the Expert's position that the County must evaluate if there are sufficient ADA-accessible vehicles available. This is especially true when multiple incarcerated persons require ADA-accessible transportation simultaneously, including when different classifications or accommodation requirements are "competing" for the same resource. Additionally, documenting "refusals" of the ADA van may not be sufficient, as a person with an ADA van need, when presented with the choice between signing a "refusal" form and missing an outside-the-jail event (court, medical appointment, etc.), may elect to not miss the appointment and agree to the non-accessible transportation.

To reach substantial compliance with provision 5.L.1, the County must:

- Ensure that incarcerated persons who require accessible transportation are transported based on their identified transportation accommodations.

5.L.2. Prescribed HCAs/ADs/DME for people with disabilities shall be available to them at all times during the transport process, including in temporary holding cells.

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.L.3. The County shall maintain a sufficient number of accessible vehicles to ensure timely transport of people with disabilities that require special transportation. The County intends for all transport vehicles to be accessible.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Analysis/Observations

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

See provision 5.L.3. above regarding the Experts identified concern about accessible transportation. The Expert also notes that the parties have agreed for the "Discontinueation of Monitoring" rating to remain (L.3), with the understanding that if provision 5.L.1 does not return to Substantial Compliance in the next round, and there is evidence that the insufficient availability of ADA-accessible vehicles is playing a role in the lack of compliance, provision 5.L.3 may be downgraded to Partial Compliance.

The County must evaluate whether sufficient ADA-accessible vehicles are available. This is especially true when multiple incarcerated persons require ADA-accessible transportation simultaneously, including when different classifications or accommodation requirements are "competing" for the same resource.

5.L.4. Staff will provide assistance to people with mobility or other disabilities where necessary to ensure safe access on and off of transport vehicles.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5. M. Effective Communication

5.M.1. The County shall develop and implement a Custody Operations policy to ensure that people with disabilities receive accommodations and services necessary to provide Effective Communication, consistent with the provisions set forth herein.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County is presently meeting this requirement and has finalized an Effective Communication Form to document compliance with this provision. The County intends to conduct training to ensure documentation regarding provision of effective communication. The County completed a comprehensive ADA training curriculum that incorporates all of the training requirements of the Remedial Plan, including this provision. The ADA training has been approved by the Expert and Class Counsel with the first training date slated to be completed in October, with continuous training to occur until all staff has completed the training.

Analysis/Observations:

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirements for staff to provide people with disabilities accommodations and services necessary to provide Effective Communication consistent with the provisions of the Settlement Agreement. The policy requires staff to ensure that people with disabilities receive accommodations and that Effective Communication is provided to incarcerated persons, enabling them to participate in the Jail's programs, services, and activities. In addition, the County has developed mechanisms within ATIMS and the ADA Tracking List for staff to identify incarcerated persons who require Effective Communication accommodations and to identify their preferred method of communication. The County has also implemented a process for staff to document the requirements of the *Murray v. Santa Barbara County* Remedial Plan.

The County utilizes Purple Communications VRS and VRI for Effective Communication in addition to other auxiliary aids when communicating with incarcerated persons during the delivery of the Jail's programs, services, and activities. In addition, Wellpath has incorporated an Adaptive Needs Assessment screening at intake to identify possible Effective Communication issues. However, as reported below, staff do not consistently provide/document effective communication as required by the *Murray v. Santa Barbara County* Remedial Plan.

To reach substantial compliance with provision 5.M.1, the County must:

- The County must ensure that Effective Communication is available for all services, programs, and activities.
- The County must provide completed Effective Communication forms and/or ADA-Effective Communication entries from the ATIMS Inmate History notes and COREMR.
- The County must train all staff on the Effective Communication requirements of the *Murray v. Santa Barbara County* Remedial Plan.

5.M.2. The County shall assess all people detained at the Jail for any period of time for Effective Communication needs and take steps to provide Effective Communication based on individual need. The County shall ensure that Jail custody and health care policies and procedures contain sufficient guidance on the provision of Effective Communication.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. Wellpath currently assesses all incarcerated persons for effective communication needs. Wellpath has adapted its MTO to incorporate the ADA Expert's additional effective communication recommendations and expanded some of the screening questions to ensure it is capturing the needs of this patient population. The County intends to conduct training to ensure documentation regarding provision of effective communication. Additionally, the Wellpath policy are currently in the process of being reviewed for sufficient guidance on the provision of effective communication.

Analysis/Observations

The Wellpath medical intake screening process assesses all people processed and detained at the Jail for disabilities. The receiving screening includes the following questions to assess Effective Communication needs (Wellpath Receiving Screening):

- Developmental Disability – (have an individual education plan or attend special education classes?)
- Any Assistive Devices

    - Type
        - Glasses
        - Contacts
        - Hearing Aid
- Patient Education – Is patient able to read or write (English/Spanish)?

Wellpath revised the Medical Treatment Order for Patient (Identification of Special Needs) – Santa Barbara, CA-R to include the following Effective Communication accommodations:

Vision Accommodation
- Provide Magnifier
- Provide Reading Glasses
- Needs Large Print

Hearing Impaired
- American Sign Language
- Lip Reading
- Pocket Talker
- Speak Loudly
- Written Communication
  * The previous MTO version included "Hearing Aid." However, this version does not have "Hearing Aid" as an option. The Expert recommends that this be included in the MTO.

Intellectual/Developmental/Learning Disability
- Simple English
- Repeat Statements
- Speak Slowly
- Rephrase statements
- Written Communication
- Read Documents

Proposed Wellpath Policy CMP-13 Effective Communication includes the requirements for all patients to be screened for effective communication needs and for medical staff to determine the patient's preferred method of communication.

The County has policies in place that require medical staff to identify the Effective Communication needs of people being processed into the Jail, and the County is conducting an assessment to identify Effective Communication needs,

The current Wellpath Policy HCD-110_F-09 Effective Communication – Santa Barbara, CA, provides sufficient guidance to Wellpath staff on the provision and documentation of Effective Communication.

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy contains sufficient guidance for Jail staff to identify incarcerated persons' Effective

Communication needs and for staff to provide Effective Communication accommodations and document the Effective Communication method(s) used. However, staff will need to be trained on the requirements of the *Murray* Remedial Plan.

To reach substantial compliance with provision 5.M.2, the County must:

- Ensure staff are trained on the policies and the *Murray* Remedial Plan requirements, and that they document Effective Communication.

5.M.3. The County shall ensure that appropriate staff assess individual Effective Communication needs at the beginning of the medical intake screening and at the beginning of the classification screening, to facilitate Effective Communication throughout those and all subsequent processes.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Non-Compliance

County Response:

The County reports it is in the process of fully implementing the requirements of this provision. Wellpath currently assesses for Effective Communication needs at intake and health appraisals. Wellpath currently trains all staff on ADA at hire and annually. Additionally, Classification deputies continuously monitor for any effective communication barriers while conducting the Classification interview.

Analysis/Observations

The Expert observed the medical intake screening process at the MJ and NBJ and interviewed classification staff regarding the assessment and provision of Effective Communication. During the medical intake screening, the medical staff assessed the individual's Effective Communication needs. During interviews with the Classification Unit, classification staff reported that they do not query and only review the MTO to assess and identify Effective Communication needs. However, the Expert notes that the completion of Effective Communication Forms was recently implemented after the ADA training commenced. As a result, insufficient proof-of-practice documentation was provided to the Expert.

To reach substantial compliance with provision 5.M.3, the County must:

- Ensure that medical intake and classification staff are trained on the policies and *the Murray* Remedial Plan requirements for assessing an individual's Effective Communication needs at the beginning of medical intake and classification screenings, and that staff conduct the assessments.
- Provide proof of practice to the Expert confirming that staff are conducting the assessment.

5.M.4. Enhanced procedures for the provision of Effective Communication, as described in the paragraph below, shall apply in the following situations:

a) Due Process Events, including the following:

i. Classification processes
ii. Disciplinary hearing and related processes
iii. Service of notice (to appear and/or for new charges)
iv. Release processes
v. Probation encounters/meetings in custody

b) Clinical Encounters, including the following:

i. Determination of medical history or description of ailment or injury
ii. Diagnosis or prognosis
iii. Medical care and medical evaluations
iv. Provision of mental health evaluations, rounds, group and individual therapy, counseling, and other therapeutic activities
v. Provision of the patient's rights, informed consent, or permission for treatment
vi. Explanation of medications, procedures, treatment, treatment options, or surgery
vii. Discharge instructions

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County is presently meeting this requirement and has finalized an Effective Communication Form to document compliance with this provision. The County intends to conduct training to ensure documentation regarding provision of effective communication. The County completed a comprehensive ADA training curriculum that incorporates all of the training requirements of the Remedial Plan, including this provision. The ADA training has been approved by the Expert and Class Counsel with the first training date slated to be completed in October, with continuous training to occur until all staff has completed the training.

Analysis/Observations

a) Due Process Events

The County produced SBSO Santa Barbara Sheriff Inmate History – Inmate Notes ADA-Effective Communication report from ATIMS and two (2) completed Santa Barbara County Sheriff's Office ADA Effective Communication Forms. The documents are not related to a due process event.

In addition, the County did not produce completed classification documents, completed service of notices (to appear and/or for new charges), completed release documents, and probation encounters/meetings in custody. Based on this, the Expert was unable to assess the County's compliance with these requirements. A review of the SBSO Santa Barbara Sheriff Inmate History – Inmate Notes ADA-Effective Communication report reflects that staff documented effective communication for the following encounters:

- ADA Check-Ins – 21
- Program participation – 10
- Custody Housing - 13

The County also produced completed Inmate Disciplinary Review (IDR) packets. Upon review of the documents, the Expert notes that the documents produced were for IDRs in 2024. The Expert reviewed the IDR packets placed in Box for all Experts for the months of August 2025 to February 2026.

The staff conducting the IDR Board use the Santa Barbara County Jail Hearing Officers Worksheet, which includes the following:

Effective Communication

- Incarcerated person was identified with the following Effective Communication needs (check all that apply:
  - None
  - Hearing
  - Vision
  - Speech
  - Learning Disability
  - Intellectual/Developmental Disability
  - SMI
  - Foreign Language Speaking (Language)
- Assistance provided to ensure Effective Communication (check all that apply):
  - Use of Text Magnifier
  - Sign Language Interpreter
  - Read Documents to Incarcerated Person
  - Written Notes (see attached notes)
  - Lip Reading
  - Spoken Slowly and Clearly
  - Foreign Language Interpreter
  - Incarcerated person was wearing hearing aid(s)
  - Other

The Expert identified five (5) IDRs where the incarcerated persons required accommodations for effective communication.

- Case #1 - IDR #35038

  - The SBSO Santa Barbara Incident Report Inmate Disciplinary Report reflects, "Effective Communication Speak slowly and clearly may require repeating of directions." In the Santa Barbara County Sheriff's Office Hearing Officers Worksheet Effective Communication section (Incarcerated Person was identified with the following Effective Communication needs), the box "None" is checked, and there is no documentation that effective communication was provided during the hearing. Additionally, there is no documentation that effective communication was provided during the pre-hearing issuance of the IDR or the final adjudicated copy of the IDR. The ADA Tracker reflects ID/DD Effective Communication: Speak slowly and clearly and may require repeating of directions."
- Case #2 - IDR #35029
  - In the Santa Barbara County Sheriff's Office Hearing Officers Worksheet Effective Communication section (Incarcerated Person was identified with the following Effective Communication needs), the "SMI" box is checked, and the "Assistance Provided box reflects "Spoken Slowly & Clearly. However, there is no documentation that effective communication was provided during the pre-hearing issuance of the IDR or the final adjudicated copy of the IDR. The ADA Tracker reflects ID/DD Effective Communication: Speak slowly and clearly and allow extra time to understand instructions and repeat instructions if necessary."
- Case #3 - IDR #35473
  - In the Santa Barbara County Sheriff's Office Hearing Officers Worksheet Effective Communication section (Incarcerated Person was identified with the following Effective Communication needs), the "SMI" box is checked, and the "Assistance Provided" box reflects "Spoken Slowly & Clearly." However, there is no documentation that effective communication was provided during the pre-hearing issuance of the IDR or the final adjudicated copy of the IDR. The ADA Tracker reflects ID/DD Effective Communication: "Speak slowly and clearly and allow extra time to understand instructions and repeat instructions if necessary."
- Case #4 - IDR #35100
  - In the Santa Barbara County Sheriff's Office Hearing Officers Worksheet Effective Communication section (Incarcerated Person was identified with the following Effective Communication needs), the box "None" is checked, and there is no documentation that effective communication was provided during the hearing. Additionally, there is no documentation that effective communication was provided during the pre-hearing issuance of the IDR or the final adjudicated copy of the IDR. The ADA Tracker reflects ID/DD Effective Communication: "Speak slowly and clearly and may require repeating of directions."
- Case #5 - IDR #35212

- In the Santa Barbara County Sheriff's Office Hearing Officers Worksheet Effective Communication section (Incarcerated Person was identified with the following Effective Communication needs), the "Intellectual/Developmental Disability" box is checked, and the "Assistance Provided" box reflects "Spoken Slowly & Clearly." However, there is no documentation that effective communication was provided during the pre-hearing issuance of the IDR or the final adjudicated copy of the IDR. The ADA Tracker reflects ID/DD Effective Communication: "Speak slowly and clearly and allow extra time to understand instructions and repeat instructions if necessary."

The ADA Coordinators and some additional staff have been documenting Effective Communication; however, the County must provide training and ensure that all staff provides and documents Effective Communication as required by the *Murray v. Santa Barbara County* Remedial Plan.

b) Clinical Encounters

The Expert identified 13 random cases with accommodations for Effective Communication. Wellpath also provided the Expert access to the COREMR so a review of clinical progress notes (medical, dental, and mental health) could be conducted to determine compliance with the Effective Communication RP requirements. The results of the review are as follows:

- Case #1 – Intellectually Disabled – Effective Communication: Speak slowly and clearly and allow extra time to understand instructions if necessary.
  - 16 encounters
    - No Effective Communication provided/documented in three (3).
    - Documentation that effective communication was established only, and no documentation of effective communication used in 13.
- Case #2 – Intellectually Disabled – Effective Communication: Speak slowly and clearly; repeat instructions; give extra time to understand and follow directions.
  - Two (2) encounters
    - No Effective Communication provided/documented in one (1).
    - Documentation that effective communication was established only, and no documentation of effective communication used in one (1).
- Case #3 – Intellectually Disabled – Effective Communication: Speak slowly and clearly using simple English; give additional time to understand instructions; repeat and rephrase instructions when necessary.
  - 14 encounters
    - No Effective Communication provided/documented in two (2).
    - Documentation that effective communication was established only, and no documentation of effective communication used in 12.

- Case #4 – Intellectually Disabled – Effective Communication: Speak slowly and clearly and rephrase if necessary; requires assistance reading and writing.
    - 35 encounters
        - No Effective Communication provided/documented in 14.
        - Effective Communication provided/documented in two (2)
        - Documentation that effective communication was established only, and no documentation of effective communication used in 21.
- Case #5 – Intellectually Disabled – Effective Communication: Needs assistance reading and writing; speak slowly and clearly and repeat instructions if necessary to ensure he understands.
    - Six (6) encounters
        - No Effective Communication provided/documented in two (2).
        - Documentation that effective communication was established only, and no documentation of effective communication used in four (4).
- Case #6 – Intellectually Disabled – Effective Communication: Simple language spoken slowly and clearly.
    - 16 encounters
        - No Effective Communication provided/documented in eight (8).
        - Effective Communication provided/documented in one (1)
        - Documentation that effective communication was established only, and no documentation of effective communication used in seven (7).
- Case #7 – Intellectually Disabled – Effective Communication: Speak slowly and clearly using simple English; give additional time to understand instructions; repeat and rephrase instructions when necessary.
    - Seven (7) encounters
        - No Effective Communication provided/documented in three (3).
        - Documentation that effective communication was established only, and no documentation of effective communication used in four (4).
- Case #8 – Intellectually Disabled – Effective Communication: Speak slowly and clearly and give extra time to respond; may need to communicate via written communication; repeat instructions and give extra time in stressful situations.
    - 13 encounters
        - Effective Communication provided/documented in four (4)
        - Documentation that effective communication was established only, and no documentation of effective communication used in eight (8).
- Case #9 – Intellectually Disabled – Effective Communication: Read documents to offender; simple language spoken slowly and clearly.
    - Three (3) encounters
        - No Effective Communication provided/documented in one (1).

        - Documentation that effective communication was established only, and no documentation of effective communication used in two (2).
- Case #10 – Intellectually Disabled – Effective Communication: Speak slowly and clearly and allow extra time and repeat if necessary; needs assistance writing.
    - 11 encounters
        - No Effective Communication provided/documented in two (2).
        - Documentation that effective communication was established only, and no documentation of effective communication used in nine (9).
- Case #11 – Intellectually Disabled – Effective Communication: Speak slowly and clearly using basic language and have repeat using own words.
    - Five (5) encounters
        - No Effective Communication provided/documented in one (1).
        - Effective Communication provided/documented in one (1)
        - Documentation that effective communication was established only, and no documentation of effective communication used in three (3).
- Case #12 – Hearing Disabled – Effective Communication: Written Notes/Lip Reading.
    - 25 encounters
        - No Effective Communication provided/documented in two (2).
        - Effective Communication provided/documented in 11.
        - Documentation that effective communication was established only, and no documentation of effective communication used in 12.
- Case #13 – Hearing Disabled – Effective Communication: Written Notes/Lip Reading.
    - Two (2) encounters
        - No Effective Communication provided/documented in one (1).
        - Documentation that effective communication was established only, and no documentation of effective communication used in one (1).

The ADA Coordinators and some additional staff have been documenting Effective Communication; however, the County must provide training and ensure all staff provide and document effective communication as required by the *Murray v. Santa Barbara County* Remedial Plan.

To reach substantial compliance with provision 5.M.4, the County must:

- Ensure staff is trained on the policy and *Murray* Remedial Plan requirements, and that staff provide and document the Effective Communication.
- Ensure staff uses the incarcerated person's preferred method of communication.

- Document the method used to achieve Effective Communication and whether and how the staff person determined that the person understood the encounter, process, and/or proceeding.
- For each such encounter, staff must document:
  - The method(s) for effective communication utilized
  - Affirmation that effective communication was established (or a note explaining the circumstances as to why EC was not achieved)

5.M.5. In the situations described in the previous paragraph, Jail staff shall:

a) Identify each person's Disability where there may be a barrier to comprehension or communication requiring reasonable accommodation(s);

b) Provide effective reasonable accommodation(s) to overcome the communication barrier; and

c) Document the method used to achieve Effective Communication and how the staff person determined that the person understood the encounter, process, and/or proceeding.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing the requirements of this provision. The County intends to conduct training to ensure documentation regarding provision of effective communication and the requirements of this provision. The County completed a comprehensive ADA training curriculum that incorporates all of the training requirements of the Remedial Plan, including this provision. The ADA training has been approved by the Expert and Class Counsel with the first training date slated to be completed in October, with continuous training to occur until all staff has completed the training.

Analysis/Observations

For a summary of the provision of Effective Communication, refer to the RP 5.M.4.

To reach substantial compliance with provision 5.M.4, the County must:

- Ensure staff are trained on the policy and *Murray* Remedial Plan requirements, and that staff provide and document the Effective Communication.
- Ensure staff use the incarcerated person's preferred method of communication.
- Document the method(s) used to achieve Effective Communication and whether and how the staff person determined that the person understood the encounter, process, and/or proceeding.

5.M.6. In determining what auxiliary aid or service to provide, the County shall give primary consideration to the request of the person with Effective Communication needs. Such

aids may include bilingual aides, SLIs, readers, sound amplification devices, captioned television/video text displays, Videophones, and telecommunication services for deaf persons, audiotaped texts, Braille materials, large print materials, writing materials, and signage.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports the ADA training has been approved by the Expert and Class Counsel with the first training date slated to be completed in October, with continuous training to occur until all staff has completed the training. The ADA training has been approved by the Expert and Class Counsel with the first training date slated to be completed in October, with continuous training to occur until all staff has completed the training.

Analysis/Observations

For a summary of the provision of Effective Communication, refer to the RP 5.M.4.

To reach substantial compliance with provision 5.M.6, the County must:

- Ensure staff are trained on the policy and the *Murray* Remedial Plan requirements, and that they provide and document Effective Communication.
- Ensure staff use the incarcerated person's preferred method of communication.
- Document the method(s) used to achieve Effective Communication and whether and how the staff person determined that the person understood the encounter, process, and/or proceeding.
- Ensure that when determining what auxiliary aid or service to provide, staff give primary consideration to the request of the person with Effective Communication needs.
- Provide the Expert proof-of-practice documentation.

5.M.7. The County shall ensure that all outside education, program, and service providers at the Jail provide Effective Communication for people participating in such programs.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Substantial Compliance

County Response:

The County reports the Expert found the County in substantial compliance for this provision.

Analysis/Observations

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirement for disabled incarcerated persons to be provided reasonable accommodations as necessary to ensure access to jail programs, services, and activities in a manner consistent with their custody designation. The policy also requires the Santa Barbara County Sheriff's Office Program Staff to issue the ADA Tracking System List to any provider working with incarcerated persons.

Staff reported that they have implemented this process. The ADA Tracker is provided to all outside providers working with incarcerated persons. The County produced SBSO Santa Barbara Sheriff, Inmate History-Inmate Notes ADA-Effective Communication. The entries reflect 10 cases in which program facilitators documented providing Effective Communication during the program. The County reports that documentation of Effective Communication is documented during the incarcerated person's initial assignment. However, program staff reported that a process to provide information about incarcerated persons' effective communication accommodation needs to outside program providers (religious, etc.) and to document the effective communication provided has not been implemented. This step is necessary to ***ensure*** that all outside education, program, and service providers provide Effective Communication as required.

To reach substantial compliance with provision 5.M.7, the County must:

- Implement a process for the County to inform outside program providers of the incarcerated persons' effective communication accommodation needs and to document the effective communication provided.

5. N. Access for Individuals with Hearing Impairments

5.N.1. The County shall develop and implement a policy for newly arrived and newly identified people with hearing disabilities to determine each person's preferred method of communication.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.N.2. Qualified Sign Language Interpreters (SLIs), on-site or through a VRI service, will be provided during intake and for due process functions, health care encounters, and Jail programming, when sign language is the person's primary means of Effective Communication, unless the person waives the assistance of an interpreter and/or delay would pose an urgent safety or security risk.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it currently provides SLI services via Purple Communication VRI during all times required by this provision and has included this provision in the Custody Operations ADA Policy (section 209). The County has not had a single instance where SLI/VRI was needed and not provided. While the County does not have many incarcerated persons within this population, the County has a process in place to ensure their effective communication needs are met.

Analysis/Observations

The Wellpath Policy, HCD-110_F-09 Effective Communication – Santa Barbara requires an SLI to be used during exchanges of health care information with patients whose primary method of communication is American Sign Language (ASL).

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirement for staff to provide Qualified Sign Language Interpreters (SLIs) on-site or through a VRI service during intake and for due process functions, health care encounters, and Jail programming, when sign language is the person's primary means of Effective Communication unless the person waived the assistance of an interpreter and/or delay would pose an urgent safety or security risk.

A review of the ADA Tracker Alerts Lists produced by the County reflects no incarcerated person with a hearing disability who uses sign language communication was housed at the SBCJ during the rating period. However, during the on-site review, an incarcerated person whose preferred method of communication is ASL was housed at the SBCJ. The County produced an Effective Communication form that was completed for her classification interview that reflects an SLI was provided. However, Effective Communication forms were not produced for the custody intake process and release process. A review of the medical record reflects that for the one (1) medical encounter, Wellpath staff used the services of a VRL/ASL interpreter.

To reach substantial compliance with provision 5.N.2, the County must:

- Ensure qualified SLIs (on-site or through a VRI service) are provided during intake and release and for all due process functions, health care encounters,

and Jail programming, when an incarcerated person's preferred method of communication is sign language, unless the person waives the assistance of an interpreter and/or delay would pose an urgent safety or security risk.
- Provide proof-of-practice documents to the Expert.

5.N.3. The County will maintain a log of:
(a) when, for whom, and for what purpose an SLI was used; and
(b) when, for whom, and why an SLI was not used for a person with an identified need for SLI services (e.g., waived or delay would have posed urgent safety or security risk).

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it currently logs SLI encounters in JMS and generates a monthly log to serve as proof of compliance with this provision. Additionally, the County will provide the ADA Expert the Purple Communications usage log as proof of compliance during the upcoming rating period.

Analysis/Observations

The Wellpath Policy, HCD-110_F-09 Effective Communication – Santa Barbara, requires Health Care Staff to document any accommodation or assistance used to reach Effective Communication with the patient when documenting exchanges of health care information.

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy requires staff to log when, for whom, and for what purpose an SLI was used.

Provision 5.N.2. details information for incarcerated persons whose preferred method of communication is ASL/SLI and the documents produced by the County. Other than the two documents cited above, there was no other documentation of cases for:
- When, for whom, and for what purpose an SLI was used.
- When, for whom, and why an SLI was not used for a person with an identified need for SLI services (e.g., waived or delay would have posed an urgent safety or security risk).

The County produced the SLI Log, which includes the required documentation of when, for whom, and why an SLI was used during the classification process. However, the log does not include why an SLI was not used for an incarcerated person with an identified need for SLI services during Intake Booking and Release. This event should be added to the log.

To reach substantial compliance with provision 5.N.3, the County must:

- Ensure staff maintains a log of when, for whom, and why an SLI was not used for a person with an identified need for SLI services (e.g., waived or delay would have posed an urgent safety or security risk).
- The types of encounters include:
  - SBSO functions: Intake Booking, Disciplinary Procedures (including initial service of disciplinary report, hearing and issuance of final adjudicated copy of the hearing), Classification (initial and reclassifications, ADA Check-Ins, Program participation, and Release.
  - Wellpath functions: Medical, Mental Health and Dental Encounters including Medical and Mental Health intake screenings.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice documents to the Expert.

5.N.4. When a prisoner waives an SLI, the log must document.
(a) the method of communication of the waiver, and
(b) the method staff used to determine that the waiver was knowing and freely given.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County utilizes the ADA Effective Communication Form to document when an incarcerated person waives SLI as required by this provision. The County is in the process of upgrading its Jail Management System (ATIMS) and this upgrade will allow the County to document such waiver and to generate logs of this waiver to meet the requirements of this provision. The County expects beta testing of the new system in the next six months and training to occur within four months after the system is finalized. In the interim, the County has developed a documentation section (ADA-SLI) in the current ADA tracking system to log this required documentation and will generate logs to demonstrate compliance with this provision during the upcoming rating period.

Analysis/Observations

The County worked with the Expert to develop a log documenting the requirements of the *Murray v. Santa Barbara County* Remedial Plan. Although the County has a process in place to document the waiver of an SLI, no documents were produced, even though an ASL/SLI/VRI was required during the custody intake and release process.

During subsequent monitoring tours, the County will need to provide the Expert with documents reflecting the waiver of an SLI/VRI, if available. The County must also include a requirement that staff log the method of communication used for the waiver when an incarcerated person whose preferred method of communication is SLI waives an SLI.

Provision 5.N.2. details information for incarcerated persons whose preferred method of communication is ASL/SLI and the documents produced by the County.

For future monitoring, the Expert will need proof of practice for cases in which an incarcerated person whose preferred method of communication is SLI waived SLI, and staff logged the method used to determine that the waiver was knowing and freely given.

To reach substantial compliance with provision 5.N.4, the County must:

- Ensure that when an incarcerated person waives an SLI, staff log the method of communicating the waiver and the method staff used to determine that the waiver was knowing and freely given.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice documents to the Expert.

5.N.5. *The County shall maintain a contract or service agreement with interpreter services, including a VRI service, To provide such services for deaf or hard of hearing prisoners. The County will ensure that appropriate Jail staff have sufficient guidance regarding use of such services.*

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.N.6. *Lip reading will not be the sole method of Effective Communication used by staff, unless the person indicates that is their preferred method of communication.*

Compliance Rating: Partial Compliance

Prior Compliance Rating: Substantial Compliance

County Response:

The ADA Expert found the County in substantial compliance with this provision.

Analysis/Observations

The Wellpath Policy, HCD-110_F-09 Effective Communication – Santa Barbara requires an SLI to be used during exchanges of health care information with patients whose primary method of communication is American Sign Language (ASL).

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy states, "Using lip reading (only if the incarcerated person indicates it is their preferred method of communication, in other instances lip reading shall not be the sole method of Effective Communication)."

There were two (2) incarcerated persons housed at the SBCJ whose preferred method of communication was lip reading/written notes. Staff did not use lip reading during the classification and medical encounter (intake screening) for the one (1) case whose preferred method of communication was ASL. The Expert could not determine how staff communicated with this incarcerated person during the custody intake and release process as no documentation (logs or Effective Communication forms) were provided to the Expert.

To reach substantial compliance with provision 5.N.6, the County must:

- Ensure that lip reading is not the sole method of Effective Communication used by staff, unless the incarcerated person indicates that it is their preferred method of communication.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice documents to the Expert.

5.N.7. In cases where the use of an SLI is not practicable, or is waived by the prisoner, Jail staff shall employ the most effective form of communication available.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. While the County presently meets the requirements of this provision, the County will be conducting training to ensure proper documentation of effective communication. The County completed a comprehensive ADA training curriculum that incorporates all of the training requirements of the Remedial Plan, including this provision. The ADA

training has been approved by the Expert and Class Counsel with the first training date slated to be completed in October, with continuous training to occur until all staff has completed the training.

Analysis/Observations

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirement for Jail staff to employ the most effective form of communication available in cases where the use of an SLI was not practicable or was waived by the incarcerated person.

There was one (1) incarcerated persons housed at the SBCJ whose preferred method of communication was ASL. The Expert could not determine how staff communicated with this incarcerated person during the custody intake and release process as no documentation (logs or Effective Communication forms) were provided to the Expert.

To reach substantial compliance with provision 5.N.7, the County must:

- Ensure that, in cases where the use of an SLI is not practicable or is waived by the incarcerated person, staff employs the most effective form of communication available.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice documents to the Expert.

5.N.8. The County shall make videophones available for deaf and hard of hearing people. The videophones shall provide for calls that utilize Video Relay Services (VRS) at no cost to deaf and hard of hearing prisoners, or for calls directly to another videophone.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.N.9 The County shall provide deaf/hard of hearing people with twice as much time for calls using telecommunication relay services, such as a videophone or TDD/TTY, to account for the fact that such conversations take longer than spoken conversations. The County shall document the time that each prisoner uses and has access to such equipment.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it has this provision included in its policy and procedures has utilized Purple VRS on a specially designated tablet which we have utilized and documented in the past. However, there were no incarcerated persons that needed this equipment during this rating period.

Analysis/Observations

The County has created a section in the ADA Tracking System to document this requirement (ADA-VRS Video phone) and has revised the Custody Operations ADA Policy (Section 209) to meet this provision's requirements.

There were no incarcerated persons who use VRS housed at the SBCJ during the rating period. During the previous tour, the County produced Santa Barbara Sheriff's Office Inmate History – Inmate Notes ADA-VRS and Videophone, which reflected that XXXX utilized Purple VRS when speaking to a DRC monitor during an interview. During previous tours, no documentation has been provided detailing the time each prisoner used or had access to videophone/VRS/TDD/TTY equipment. During subsequent monitoring tours, the County will need to provide documents to the Expert, if available, reflecting that Jail staff documented the time each incarcerated person used and had access to videophone/VRS/TDD/TTY equipment.

To reach substantial compliance with provision 5.N.9, the County must:

- Ensure staff document the time each incarcerated person uses and has access to telecommunication relay services, such as a videophone or TDD/TTY.
- Ensure staff are trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice that deaf/hard-of-hearing incarcerated persons are provided with twice as much time for calls using telecommunication relay services, such as a videophone or TDD/TTY.

5.N.10. People who require an SLI as their primary method of communication shall be provided an SLI for education, vocational, and religious programs.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it currently provides SLI services via Purple Communication VRI during all times required by this provision and has included this provision in the Custody Operations ADA Policy (209). The County provides the ADA Tracker to any provider working with incarcerated persons. The County has not had a single instance

where SLI/VRI was needed and not provided. While the County does not have many incarcerated persons within this population, the County has a process in place to ensure their effective communication needs are met.

Analysis/Observations

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy requires staff to provide an SLI/VRI for education, vocational, and religious programs when the incarcerated person's primary method of communication is SLI.

A review of the County's Active ADA Alerts shows no incarcerated persons with hearing disabilities who use sign language were housed at the SBCJ during the rating period. The County established a contract with "Purple Communications" on 1/11/23 for on-demand sign language interpreting services.

Provision 5.N.2 details information for incarcerated persons whose preferred method of communication is ASL/SLI and the documents produced by the County. However, during the review of the document production, the Expert noted that no "case notes" or Effective Communication Forms were completed for education, vocational, and religious programs. Program staff interviewed reported they are aware of *Murray* Remedial Plan requirements and how to obtain interpreting services.

During subsequent monitoring tours, the County will need to provide documents to the Expert, if available, reflecting that Jail staff provided an SLI/VRI for education, vocational, and religious programs when the incarcerated person's primary method of communication is SLI.

To reach substantial compliance with provision 5.N.10, the County must:

- Ensure incarcerated persons who require an SLI as their primary method of communication are provided an SLI for education, vocational, and religious programs.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice to the Expert.

5.N.11. In housing units where an individual with a hearing-related disability resides, public announcements shall be communicated as consistent with individual Effective Communication needs. This includes announcements regarding visiting, meals, recreation release and recall, count, lock-up, and unlock. Verbal announcements may be effectively communicated via written messages on a chalkboard or dry-erase board or by personal notification, as consistent with individual needs. These procedures shall be communicated to people during the orientation process and shall be incorporated into relevant policies and post orders.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. Per the Expert's Recommendation, the County will incorporate this provision into the orientation video required by provision 5.C.3. The County completed a comprehensive ADA training curriculum that incorporates all of the training requirements of the Remedial Plan, including this provision. This ADA training has been reviewed and approved by the ADA Expert and Class Counsel. The County anticipates completing the initial training this October and this provision in the next six months.

Analysis/Observations

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirement for staff in housing units where an individual with a hearing-related disability resides, for public announcements to be communicated as consistent with the individual's Effective Communication needs. The policy requires staff to effectively communicate announcements for visiting, meals, recreation release, recall, count, lock-up, and unlock. Additionally, the policy allows verbal announcements to be communicated effectively through written messages posted on a chalkboard or dry-erase board, or through personal notification, as appropriate to individual needs.

The Expert reviewed the Santa Barbara County Sheriff's Office Custody Operations Orientation Handbook and found that the Handbook contains the following language: "Jail staff will be sure to let you know about all directions and announcements." The orientation video uses the same language and is shown daily in the MJ Intake Release Center intake area and on the County televisions (MJ and NBJ).

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirement for staff in housing units where an individual with a hearing-related disability resides for public announcements to be communicated as consistent with the individual's Effective Communication needs. The policy requires staff to effectively communicate announcements for visiting, meals, recreation release, recall, count, lock-up, and unlock. Additionally, the policy allows verbal announcements to be communicated effectively through written messages posted on a chalkboard or dry-erase board, or through personal notification, as appropriate to individual needs. The County did not produce post orders for the Expert to review.

To reach substantial compliance with provision 5.N.11, the County must:

- Ensure that in housing units where an individual with a hearing-related disability resides, public announcements (regarding visiting, meals, recreation release and recall, count, lock-up, and unlock) are communicated as consistent with the individual's Effective Communication needs.

- Ensure the policies, procedures, and staff guidance are complete and fully compliant with the Remedial Plan requirement._
- Ensure all relevant forms, logs, etc., are maintained and accessible to all staff, with appropriate language and guidance as warranted._
- Ensure that all staff are trained on the relevant Remedial Plan requirement(s)._
- In the event that one or more SLI users are booked/detained at the Jail during the monitoring period, ensure (with proof of practice) the provision of SLI and other hearing disability-related accommodations consistent with Remedial Plan requirement(s) is provided to the Expert.

5. O. Prisoners with Intellectual/Developmental Disabilities

5.O.1. The County shall develop and implement a comprehensive written policy and procedure regarding people with Intellectual and/or Developmental Disabilities, including:

a) Screening;
b) Identification of their adaptive support needs and adaptive functioning deficits; and
c) Monitoring, management, and accommodations for people with Intellectual or Developmental Disabilities.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. As acknowledged by the ADA Expert, Custody Operations ADA Policy (209) includes the requirements of this provision. Wellpath will also revise its Receiving Screening Policy (E-02) and Adaptive Supportive Needs Policy (F-O1B). The County anticipates completing this requirement in the next five months.

Analysis/Observations:

In 2022, Wellpath piloted a policy and process to screen incarcerated persons for intellectual and developmental disabilities. The pilot screening process included screening questions (Adaptive Needs Assessment) and a referral process to a psychologist for cases of potential Intellectual/Developmental Disability. The screening and identification process included timelines for the psychologist to contact the incarcerated person, with an expedited process for urgent referrals. The psychologist would conduct a record review, psychological testing using standardized intelligence assessments such as the Quick Test (QT) and the Test of Nonverbal Intelligence-4 (TONI-4), and an Adaptive Support Evaluation. The psychologist would identify adaptive support deficits and adaptive support needs while in custody for cases identified as having an Intellectual/Developmental disability. The psychologist

would also develop an adaptive support needs plan. Incarcerated persons who had an adaptive support needs plan were enrolled in the Mental Health Special Needs Program.

Due to management changes, the pilot program was halted. Wellpath redeveloped and implemented the process. Wellpath staff reported that the Wellpath policies (site-specific) have been finalized, and a psychologist has been hired and conducts the evaluations/secondary testing. Wellpath has a process in place to screen incarcerated persons for intellectual and developmental disabilities and identify adaptive deficits and adaptive supports as required by the *Murray v. Santa Barbara County* Remedial Plan.`

The psychologist who conducts the assessments reported that all evaluations are conducted via Telehealth. He completes a TONI-4, a standardized assessment of intelligence, aptitude, abstract reasoning, and problem solving as part of the evaluation. He also reported that the areas he assesses include:

- Effective Communication
- Victimization
- Use of the tablet (ordering commissary)
- Ability to contact their attorney
- Accessing medical
- Performing activities of daily living (shower, brushing teeth, laundry, etc.)

The psychologist reported he reviews information (notes) in the medical record; however, no information from custody staff is provided to or used by the psychologist. The psychologist also reported that if the incarcerated person has been identified as a regional center client, the regional center file is used as part of the evaluation in addition to the CDCR Armstrong notice if the incarcerated person was previously identified as a class member in the *Clark v. California* Developmental Disability Program. The results of the evaluation, including identified adaptive deficits and adaptive supports, are entered as a progress note in CorEMR and also provided to ADA staff by Wellpath staff. A review of a completed evaluation reflects the evaluation includes recommendations for:

- Effective Communication
- Adaptive Supports
    - Assistance with reading and writing
    - Preferred methods of communication
    - Assistance and reminders to perform self-care and/or daily living activities
    - Housing (risk for physical or emotional abuse by other incarcerated persons
    - Additional time, training, orientation for new situation and job

In addition, the evaluation addresses:

- Communication Skills
- Academic Skills
- Self-Care Skills
- Socialization Skills
- Self-Advocacy Use of Resources
- Work
- Health and Safety
- Self-Direction
- Leisure

The psychologist reported that the evaluation does not include recommendations for the frequency of adaptive supports, prompts, and reminders.

However, the Expert notes that the ID/DD Housing Unit Adaptive Support Needs Log used by custody staff to document adaptive supports (prompts, reminders, and assistance) includes:

- Dayroom and Outdoor Recreation Reminder (1X per week)
- Clothing Exchange Participation (1X per week)
- Assist with Reading and Writing (1X per week)
- Assess for Victimization or Commissary being taken (1X per week)
- Shower and Brushing Teeth Reminder (2X per week)
- Cleaning Cell Reminder (2x per week)
- Clinical Appointments (as needed)

The Expert recommends that Wellpath and Custody collaborate to ensure the psychologist's evaluation (including recommendations) align with the ID/DD Housing Unit Adaptive Support Needs Log used by custody staff to accurately reflect the identified deficits and supports the incarcerated person needs while housed in the Santa Barbara County jails.

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy requires custody staff to be made aware of incarcerated persons identified as Intellectually/Developmentally disabled and their adaptive support needs. The policy also requires staff to provide and document adaptive supports.

The County, through Wellpath, produced 20 completed evaluations.

- October 2025 – 3
- February 2026 – 1
- March 2026 – 4
- April 2026 – 4
- May 2026 – 7

- June 2026 - 1

The County produced a "DD_ID Tri-County Regional Center Contact" Excel spreadsheet, which lists 4 cases in which the County contacted the Tri-County Regional Center during the rating period. These four cases were not included in the completed evaluations produced by the County.

As Wellpath recently reimplemented the evaluation process, the Expert notes that no evaluations were produced for August 2025, September 2025, November 2025, December 2025, and January 2026.

To reach substantial compliance with provision 5.0.1, the County must:

- Ensure that Wellpath and custody staff work together to ensure the evaluation and the ID/DD Housing Unit Adaptive Support Needs Log are coordinated to accurately identify the required supports for each individual.
- Revise Wellpath policy with recommendations provided by the Expert as part of the Wellpath policy review process.
- Provide all completed evaluations, including the cases not designated as ID/DD.

5.O.2. If a person is known to have or suspected of having an Intellectual or Developmental Disability, the County shall contact the appropriate Regional Center within the next business day of the person's arrival at the Jail. The County shall request the prisoner's current IPP (Individualized Program Plan) with the individual's authorization. Once received, medical and custody staff shall review the IPP to ensure that all communications and services being provided are appropriate. If the person is not a Regional Center client, the County shall request that the Regional Center (or other appropriate agency) perform an evaluation. Whenever possible, Jail staff will work with the Regional Center and any relevant County agencies to move a person with an identified Intellectual or Developmental Disability out of custody and into a setting with appropriate supports to meet the person's individual needs.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports that Wellpath's Mental Health Coordinator communicates with Tri-Counties Regional Center staff regarding the identified inmates and appropriate treatment plans as required by this provision. The County maintains a log to record interactions with Tri-County Regional Center. The County will provide the ADA Expert with proof of practice to demonstrate compliance with this provision.

Analysis/Observations

The County produced a "DD_ID Tri_County Regional Center Contact" Excel spreadsheet, which lists 4 cases in which the County contacted the Tri-County Regional Center during the rating period. The Expert reviewed the ADA Tracker Lists produced by the County and identified three (3) cases indicating an actual or potential intellectual/developmental disability that were not included in the " DD_ID Tri_County Regional Center Contact " list.

The County must ensure that policies and procedures are implemented requiring that, in cases where a person is known to have, or suspected of having, an Intellectual or Developmental Disability, the County contact the appropriate Regional Center within the next business day after the person's arrival at the Jail. Post monitoring tour, the County reported they have re-initiated this process and intend to continue the practice for all incarcerated persons who are suspected to have an intellectual or developmental disability.

Of the four (4) cases listed in the DD_ID Tri-County Regional Center Contact list, in two (2) cases the list reflects the incarcerated person is a prior/current Tri-County client, and in two (2) cases the list reflects the incarcerated person is not a Tri-County current/prior client. The "DD_ID Tri-County Regional Center Contact" Excel list does not indicate that the County reviewed the IPP (Individualized Program Plan).

For individuals who are Regional Center clients, the County must ensure that it requests the incarcerated person's current IPP with the individual's authorization.

The County produced the MDT IPP Reviews for the document production period. The meetings are held every week and include a review of Safety/Victimization Concerns, Adaptive Supports, and Program/Housing Accommodations. In review of the MDT Meeting IPP Reviews, there is no reference to a review of the Tri-County IPP.

The County must ensure that, once received, medical and custody staff review the Regional Center IPP to confirm that all communications and services provided are appropriate.

Of the two (2) cases in which the incarcerated person was not a Regional Center client, the County did not produce documentation showing that it requested that the Regional Center (or another appropriate agency) perform an evaluation.

The County must ensure that, for cases in which the incarcerated person is not a Regional Center client, the County requests that the Regional Center (or other appropriate agency) perform an evaluation when warranted.

The County did not produce documentation for cases where Jail staff worked with the Regional Center and any relevant County agencies to move a person with an identified Intellectual or Developmental Disability out of custody and into a setting with appropriate supports to meet the person's individual needs.

To reach substantial compliance with provision 5.O.2, the County must:

- Ensure that in cases where an incarcerated person is known to have or suspected of having an Intellectual or Developmental Disability, the County contacts the appropriate Regional Center within the next business day of the incarcerated person's arrival at the Jail.
- Ensure staff requests the incarcerated person's current IPP (Individualized Program Plan) with the individual's authorization.
- Once the IPP is received, ensure that medical and custody staff review it to confirm that all communications and services provided are appropriate.
- In cases where the incarcerated person is not a Regional Center client, ensure the County requests that the Regional Center (or other appropriate agency) perform an evaluation when warranted.
- Ensure that, whenever possible, Jail staff work with the Regional Center and any relevant County agencies to move a person with an identified Intellectual or Developmental Disability out of custody and into a setting with appropriate supports to meet the person's individual needs.
- Ensure staff is trained on *Murray* Remedial Plan requirements.
- Provide proof-of-practice to the Expert.

5.O.3. People identified as having an Intellectual or Developmental Disability will be provided with accommodations tailored to their needs, which may include but are not limited to communications at the appropriate comprehension level, more time to complete directions, and specific behavioral supports.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Non-Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The Custody Operations ADA Policy (209) includes the requirements of this provision. Wellpath is conducting screening of individuals with ID/DD. Wellpath also implemented an Adaptive Support Needs Assessment Form to identify possible ADA inmates during receiving, as well as a "learning disability" check box on the MTO. The County updated its Classification Interview Form, which custody deputies use during the Classification Interview prior to housing incarcerated persons. Such form incorporates the ADA Expert's additional intake questions that are not already achieved in the medical intake process, including those necessary to screen for ID/DD. Wellpath is in the process of redeveloping its pilot program for identifying ID/DD incarcerated persons and estimates that this program will return in the next six to eight months.

Analysis/Observations

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy includes the requirement for staff to provide Intellectually/Developmentally disabled incarcerated persons with accommodations tailored to their needs, which include but are not limited to communications at the appropriate comprehension level, more time to complete directions, and specific behavioral supports. However, the process for screening, identification, and verification of Intellectually/Developmentally disabled incarcerated persons and their adaptive support needs is currently not in place. Additionally, a process for staff to document the provision of the accommodations is not in place.

The County implemented the ID/DD Housing Unit Adaptive Support Needs Log used by custody staff to document adaptive supports (prompts, reminders, and assistance). Details regarding the information documented by staff are detailed in section 5.O.1. above. In addition, the incarcerated persons' adaptive supports are listed in the County's ADA Tracker List, which is available to staff. The County produced six (6) completed ID/DD Housing Unit Adaptive Support Needs Logs.

- March 2026 – 1 log for one (1) incarcerated person and two (2) logs for one (1) incarcerated person.
- April 2026 – 1 log for 2 incarcerated persons

The March ID/DD Housing Unit Adaptive Support Needs Logs reflect that for one (1) log, all areas of the log were completed by staff and signed by the supervisor every week, and the other log was not reviewed by the supervisor, and for one (1) week, no supports and/or reminders were logged. The April ID/DD Housing Unit Adaptive Support Needs Logs reflect all areas of the log completed by staff and signed by the supervisor every week. During the on-site review, the Expert noted that an ID/DD Housing Unit Adaptive Support Needs Log was not located in SBJ East and the ADA Tracker listed an ID/DD incarcerated person housed there, and the ID/DD Housing Unit Adaptive Support Needs Logs in NBJ J/K/M Mods were not reviewed by the supervisor.

To reach substantial compliance with provision 5.O.3, the County must:

- Ensure incarcerated persons identified as having an Intellectual or Developmental Disability are provided with accommodations tailored to their needs, including, but not limited to, communication at an appropriate comprehension level, additional time to follow directions, and specific behavioral supports.
- Ensure staff document adaptive supports on the ID/DD Housing Unit Adaptive Support Needs Logs, and supervisors review the logs as required weekly.
- Provide all completed ID/DD Housing Unit Adaptive Support Needs Logs to the Expert for the document production period.

5.O.4. A multidisciplinary team that includes appropriate health care staff will monitor and ensure appropriate care for people with an Intellectual or Developmental Disability.

The multidisciplinary team will develop an individualized plan for each person with an Intellectual or Developmental Disability, which addresses:
(1) safety, vulnerability, and victimization concerns,
(2) adaptive support needs, and
(3) programming, housing, and accommodation needs.
The multidisciplinary team's plan will be regularly reviewed and updated as needed.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Non-Compliance

County Response:

The County reports it is in the process of fully implementing this provision. As of August 2024, the County began holding a multidisciplinary meeting that meets the requirements of this provision for individuals who have been identified as ID/DD by other agencies, by self-identification, or by family members of the incarcerated person. The County also develops individualized treatment plans for these individuals. The County is working with the Wellpath mental health team to house these individuals in housing that is appropriate to their needs. Wellpath is in the process of redeveloping its pilot program for identifying ID/DD incarcerated persons and estimates that this program will return in the next six to eight months. Once complete, the County will expand these meetings to include all incarcerated persons identified as ID/DD.

Analysis/Observations

As noted in section 5.O.1, above, Wellpath re-implemented the process for identifying intellectual and developmental disabilities and finalized site-specific Wellpath policies, which includes a process to screen incarcerated persons for intellectual and developmental disabilities and identify adaptive deficits and adaptive supports as required by the *Murray v. Santa Barbara County* Remedial Plan.

The RP requires the County to develop an individualized plan that addresses:
- safety, vulnerability, and victimization concerns,
- adaptive support needs, and
- programming, housing, and accommodation needs.

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed that the policy requires a multidisciplinary team, including appropriate healthcare staff, to monitor and ensure appropriate care for people with an Intellectual or Developmental Disability. The policy includes the requirements and processes for the multidisciplinary team to ensure the provision of adaptive support services necessary for a developmentally or intellectually disabled inmate to function at an acceptable level in the jail environment. The policy includes specific functions and timelines for the multidisciplinary team to conduct the reviews. However, as previously noted, the process for screening and verification of

Intellectually/Developmentally disabled incarcerated persons and their adaptive support needs has begun to roll out, as discussed above (Section O). Implementation will requirefurt her work ahead.

As discussed above, the County and Wellpath have developed procedures to implement these individualized plan processes and components. Procedures, including multidisciplinary team (MDT) meetings, are in place.

The County produced the MDT Meeting IPP Reviews for the document production period. The meetings are held every week and include a review of the current SBCJ IPP prepared by Wellpath. The areas reviewed include:

- Safety, Vulnerability, and Victimization
- Adaptive Support Needs
- Programming, Housing, and Accommodation Needs

The notes reflect input from Classification staff, Mental Health staff, and input from the incarcerated person (interview prior to the meeting). The meeting notes do not include the names and titles/classifications of the staff present, nor do they identify the author of the notes.

To reach substantial compliance with provision 5.O.4, the County must:

- The Expert recommends that the MDT Meeting IPP Reviews include the names and titles/classifications of staff present, as well as the author of the notes.
- The County must also ensure that the weekly multidisciplinary meetings be clear as to each individualized plan's content and clearly indicate whether any updates to the individualized plan are considered or made.

5. P. Physical Accessibility Requirements

5.P.1. The County shall implement an ADA transition plan to remedy Main Jail physical plant features that could result in access barriers for people with disabilities.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. In 2018, the County commissioned Vanir Construction to identify ADA deficiencies and develop an ADA transition plan for the Main Jail. On November 9, 2021, a contract was awarded to Nacht and Lewis for redesign of the main jail campus to bring it in compliance with ADA requirements. In 2022, Nacht and Lewis began holding a series of workshops with the County's project team to develop detailed program requirements for renovating the existing facilities. As a result of those meetings, the County is

proceeding with remodel of the Inmate Receiving Center of the Main Jail to address accessibility concerns, which is scheduled to be complete by Summer of 2027. Intake Improvements will include accessibility compliance of cells, showers, public restrooms, visiting (for public and incarcerated population), and toilets for the incarcerated population, as well as an ADA path-of-travel to public parking. The County will also remedy accessibility issues in the main recreation yard at the Main Jail.

Per the terms of the parties' August 2023 Stipulation, the County intends to achieve compliance with the Remedial Plan through addition of ADA-compliant housing capacity at the Northern Branch Jail. Upon activation of the additional unit(s) at the Northern Branch Jail (expected by 2029), the County will cease housing class members in the Main Jail's South, West, East, Central, and Back Central housing units. Per the parties' agreement, the housing units in West, East, Central, Back Central, and Northwest need not undergo physical plant remediation of existing ADA accessibility deficiencies as part of interim or long-term remedial measures set forth in the Remedial Plan. In the interim, the County ceased housing class members with ADA accessible housing needs in any of the housing units in West, East, Central, Back Central, and ensures that all class members with ADA accessible housing needs are provided accessible housing and equitable access to the Jail's programs, services, and activities. The County initiated interim accessibility measures, including installing ADA-accessible workout equipment in the recreation yards at both facilities, ensuring equal access to programming and mental health housing, and initiating discharge planning protocols to ensure accommodations and accessible transportation is provided on discharge.

Full compliance of this provision will likely follow remodel, reconfiguration, renovation, or new construction of the facilities as contemplated in paragraph 10 of the Stipulated Judgement.

Analysis/Observations:

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In the previous report, the Expert noted that on May 16, 2023, the County of Santa Barbara Board of Supervisors voted to recommend that the Board of Supervisors:

- Receive a report on conceptual options for renovations at the MJ and new construction at the NBJ Jail;
- Regarding the MJ, direct staff to proceed with a minimal renovation plan that addresses the Inmate Reception Center's Americans with Disabilities Act (ADA) requirements and eliminates the use of other beds.

The County's transition plan acknowledges that SBJ units (other than IRC) are not accessible and that there is no plan to make them accessible and the plan is to deactivate those units with the completion of the NBJ facilities plan. The County previously provided an update on the construction plan of the MJ-Intake Release Center (IRC). The plan includes making ADA modifications to the intake area, visiting, and housing units of the IRC. The plans also include ADA-compliant paths of travel,

holding cells, visiting, recreational yards, housing unit cells, and showers. The County reports that the remodel of the Inmate Receiving Center of the Main Jail to address accessibility concerns is targeted to be completed by May of 2027.

To reach substantial compliance with provision 5.P.1, the County must:

- Implement the ADA transition plan to address the MJ physical plant features that could create access barriers for people with disabilities.
- The deactivation of the SBJ units must be completed in order to achieve Substantial Compliance with the requirement to "implement an ADA transition plan to remedy Main Jail physical plant features that could result in access barriers for people with disabilities.

5.P.2. The above ADA transition plan will be implemented in the timeframe set forth in the Stipulated Judgment. The County and the Sheriff's Office agree that, during the period of implementation of the ADA transition plan at the Main Jail, they will take all reasonable steps to promote and ensure accessibility for people with disabilities to the maximum extent possible. This includes the use of interim measures to address existing access barriers to ensure safety and program access for people with disabilities.

2023 Stipulation Interim Measures: Defendants will complete development of the ADA Transition Plan for the entire Jail system, to include interim measures to address disability accessibility deficiencies, as follows:

1) Measures During Period of Physical Plant Remediation/Improvements. Defendants will implement interim remedial measures towards mitigating ADA/Disability-related physical plant deficiencies consistent with the plan contained in Exhibit A.

2) Development of ADA Plan for Main Jail Renovation. As a part of the design phase of the ADA improvements for the Main Jail renovation, Defendants shall provide the design plans, with timelines, for implementation of ADA improvements referenced in Paragraph 1 of Exhibit A, which shall be developed with input from Plaintiffs' counsel and the Remedial Plan Experts.

3) Main Jail Units Slated for Non-Use Are Not Subject to Physical Plant Remediation, Exclusion from Housing Class Members with Disabilities. Defendants intend to achieve compliance with the Remedial Plan through the addition of ADA-compliant housing capacity at the Northern Branch Jail. Upon activation of the additional unit(s) at the Northern Branch Jail (expected by 2029),

Defendants will cease housing any class members in the Main Jail's South, West, East, Central, and Back Central housing units. Accordingly, the Parties further agree:

a) The housing units in West, East, Central, Back Central, and Northwest need not undergo physical plant remediation of existing ADA accessibility deficiencies as part of interim or long-term remedial measures set forth herein and in the Remedial Plan.

b) By no later than December 1, 2023, Defendants will cease housing class members with ADA accessible housing needs in any of the housing units in West, East, Central, Back Central, and Northwest, and will ensure that all class

members with ADA accessible housing needs are provided accessible housing and equitable access to the Jail's programs, services, and activities (see Remedial Plan Section V.H (Housing Placements)).

c) *South Dorm may continue to house class members with ADA accessible housing needs until the activation of the planned additional housing unit(s) at Northern Branch Jail, so long as all facilities for that unit (beds, toilets, lavatories, showers, recreation space, etc.) meet ADA accessibility requirements under federal and state law, and class members with disabilities in that housing unit are provided equitable access to the Jail's programs, services, and activities (STP, education, jobs, recreation, etc.)*

Disability Accessibility Measures During Period of Physical Plant Remediation/Improvements.

Defendants will implement interim remedial measures towards mitigating ADA/Disability-related physical plant deficiencies as follows:

1. *The County will remediate the accessibility deficiencies at the Main Jail in the Inmate Reception Center and the South Dorm, with completion by April 27, 2027. Intake Improvements will include accessibility compliance of cells, showers, public restrooms, visiting (for public and incarcerated population), and toilets for the incarcerated population, as well as an ADA path-of-travel to public parking. The County will also remedy accessibility issues in the main recreation yard at the Main Jail.*
2. *The County will install general-use and equivalent ADA-accessible workout equipment in all recreation yards facility-wide by December 2023.*
3. *The County is committed to providing complete and equitable programming to individuals with disabilities, consistent with relevant Remedial Plan requirements. Programming, including the Sheriff's Treatment Program, is offered to all incarcerated people across the facilities, including those in South Dorm. Incarcerated people in South Dorm recently completed a six-week program.*
4. *The County has initiated discharge planning protocols for individuals with disabilities to ensure that they are discharged with any necessary accommodations and provided accessible transportation when needed.*
5. *The County is committed to providing equal access to the specialized mental health units for people with physical, visual, hearing, cognitive, and any other disabilities*

Compliance Rating: Partial Compliance

Prior Compliance Rating: Un-ratable

County Response:

Please see 5.J.1. and 5.P.1. above.

Analysis/Observations

On May 16, 2023, the County of Santa Barbara Board of Supervisors voted to recommend that the Board of Supervisors:

- Receive a report on conceptual options for renovations at the MJ and new construction at the NBJ;
- Regarding the MJ, direct staff to proceed with a minimal renovation plan that addresses the Inmate Reception Center's Americans with Disabilities Act (ADA) improvements and eliminates the use of other beds.

The timeline in the stipulation includes:

The County will remediate accessibility deficiencies at the Main Jail, Inmate Reception Center, and South Dorm, with completion by April 27, 2027. Improvements will include accessibility compliance for cells, showers, public restrooms, visiting areas (for both the public and incarcerated populations), and toilets for the incarcerated population, as well as an ADA path of travel to public parking. The County reports that the remodel of the Inmate Receiving Center of the Main Jail to address accessibility concerns is targeted to be completed by May of 2027. The County will also need to remedy accessibility issues in the main recreation yards at the Main Jail, as discussed in this report.

The Expert confirmed that general-use, ADA-accessible workout equipment is installed in all recreation yards at the MJ and NBJ.

The County reports that any incarcerated person who requires accessible housing accommodations is currently housed at the NBJ unless they elect to stay at the MJ by signing a waiver drafted with input and approval from the Expert and Class Counsel.

The County reports that in the interim, the County has ceased housing class members with ADA accessible housing needs in any of the housing units in MJ West, East, Central, Back Central, and Northwest (unless they elect to stay at the MJ by signing a waiver that was drafted with input and approval of the Expert and Class Counsel).

The County has also initiated interim accessibility measures, including installing ADA-accessible workout equipment in the recreation yards at both facilities, working to ensure equal access to programming and mental health housing, and implementing discharge planning protocols to ensure accommodations and accessible transportation are provided upon discharge.

The County is taking reasonable steps to promote and ensure accessibility for people with disabilities. These steps include the use of interim measures to address existing access barriers and ensure safety and program access for people with disabilities during the implementation of the ADA transition plan at the MJ. Some of these interim measures include:

- Escorting Mobility-Disabled incarcerated people to accessible shower locations.
- Escorting and assisting Mobility-Disabled incarcerated people to accessible exercise yard facilities.
- Providing access to video phone technology via iPhone and iPad technology.

However, the MJ continues to not provide programming opportunities such as those that are offered at the NBJ (Alan Hancock College) and the MJ Northwest Isolation workers housing (Santa Barbara City College), and mobility for incarcerated persons housed in the MJ Northwest BHUs and MJ South Dorm is only provided with remote programming opportunities. The incarcerated persons housed in the BHUs do not have access to in-person programs that are available in other housing locations. Because the BHUs house people with mental health disabilities, it is essential that this group has equal access to programs, including community-based programming. As these modules primarily house people with mental health disabilities (Northwest) and medical/physical disabilities (MJ South Dorm), it is essential that this group have equal access to programs and community-based programming.

Additionally, during a previous onsite review, the Expert identified some accessibility concerns in the MJ recreation yards for disabled incarcerated persons who use wheelchairs. There is currently no accessible seating in two (2) of the recreation yards that are used by the disabled incarcerated persons who use wheelchairs. The Expert has requested that the Accessibility Expert be granted access to conduct an on-site physical plant assessment of the MJ recreation yards. The County has not given the Expert approval to conduct the assessment. These accessibility improvements cannot be deferred during the period of renovations at MJ. The Expert will review the accessibility improvements before the next monitoring tour.

To reach substantial compliance with provision 5.P.2, the County must:

- Remediate the accessibility deficiencies at the MJ IRC by the summer of 2027.
- Ensure disabled incarcerated people are provided access to equivalent programs at the MJ.

5.P.3. The County shall ensure that the North Branch Jail provides adequate accessibility for people with disabilities, consistent with accessibility requirements under federal and state law.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is

no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5. Q. Alarms/Emergencies

5.Q.1. The County shall implement written policies regarding the expectations of staff as to persons with disabilities during emergencies and alarms, including as to disabilities that may affect their ability to comply with orders or otherwise respond to emergencies and alarms. For example, the policies shall ensure appropriate handling of people with mobility-related disabilities who are unable to prone out or take a seated position on the ground during an alarm or emergency. Such policies shall be communicated to staff, incorporated into the relevant policies, and communicated to people with disabilities using Effective Communication.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County completed a comprehensive ADA training curriculum that incorporates all of the training requirements of the Remedial Plan, including this provision. This ADA training is pending final review by the ADA Expert and Class Counsel. Once approved and finalized, the County will initiate training to all staff. The County anticipates completing this provision in the next six months.

Analysis/Observations:

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy, Section 209 (Revised 04/2024), and confirmed that the policy includes the *Murray* Remedial Plan requirements.

The County is currently training all staff on the *Murray v. Santa Barbara County* remedial plan. The training includes the requirements of this provision. In addition, although training has been developed on the revised ADA policy, training has not been completed. The County must ensure the policies are communicated to staff.

The County did not provide proof of practice that the policy has been communicated to incarcerated persons with disabilities using Effective Communication. The County has developed an "ADA Inmate Interview Worksheet" designed to be used to interview incarcerated persons once they are identified as having a qualified disability. The worksheet does not include the RP-required language. In addition, the Orientation Video also does not include the RP-required language.

To reach substantial compliance with provision 5.Q.1, the County must:

- Ensure staff are trained on policies outlining expectations for staff to provide accommodations for disabled incarcerated persons during emergencies and alarms, including disabilities that may affect their ability to comply with orders or otherwise respond.
- Revised the Orientation Video/Handbook to include the RP required language.
- Ensure the policies are communicated to incarcerated persons with disabilities using Effective Communication.
- Provide proof-of-practice to the Expert.

5.Q.2. To facilitate appropriate accommodations during alarms or emergencies, the County shall offer, but shall not require, individuals who have disabilities visible markers to identify their disability needs (e.g., wristbands). The County shall maintain a list, posted in such a way to be readily available to Jail staff in each unit, of people with disabilities who may require accommodations during an alarm or emergency.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5.Q.3. *The County shall install visual alarms appropriate for people who are deaf or hard of hearing.*

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County completed a comprehensive ADA training curriculum that incorporates all of the training requirements of the Remedial Plan, including this provision. This ADA training is pending final review by the ADA Expert and Class Counsel. Once approved and finalized, the County will initiate training to all staff. The County anticipates completing this provision in the next six months.

Analysis/Observations

All housing units at the NBJ have visual alarms installed. All housing units at the MJ, except Central and West dorms, do not have visual alarms installed. The County reports that with the activation of the additional unit(s) at the Northern Branch Jail

(expected by 2029), the County will cease housing class members in the Main Jail's South, West, East, Central, and Back Central housing units. Per the parties' agreement, the housing units in West, East, Central, Back Central, and Northwest need not undergo physical plant remediation of existing ADA accessibility deficiencies as part of interim or long-term remedial measures set forth in the Remedial Plan.

To reach substantial compliance with provision 5.Q.3, the County must:

- Ensure visual alarms that meet the NFPA 72, 'National Fire Alarm Code', are installed in the IRC housing units when the ADA renovations are made.

5.Q.4. All housing units shall post notices for emergency and fire exit routes.

Compliance Rating: Discontinuation of Monitoring

Prior Compliance Rating: Discontinuation of Monitoring

Discontinuation of Monitoring

Pursuant to the parties' stipulated joint request and the *Murray* court's May 4, 2026, order (Docket 106), monitoring for this provision has been suspended. The provision will therefore be subject to future monitoring only if it is determined that the County is no longer in substantial compliance, consistent with the procedure set forth in Paragraph 53.

5. R. Quality Assurance

5.R.1. The County shall develop and implement written policies and procedures regarding monitoring compliance with ADA requirements and Jail ADA policies, including (but not limited to) the following:

a) Requests for ADA accommodations;
b) ADA-related grievances;
c) ADA-related training;
d) Use of the ADA Tracking System.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. The County completed a comprehensive ADA training curriculum that incorporates all of the training requirements of the Remedial Plan, including this provision. This ADA training has been reviewed and approved by the ADA Expert and Class Counsel. The County will initiate training to all staff in October of this year. The County anticipates completing this provision in the next six months.

Analysis/Observations:

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) to confirm that the policy includes an ADA accountability plan that monitors compliance with ADA requirements and Jail ADA policies. The policy states, "The ADA Coordinator shall review and compile data regarding the following quality assurance indicators and shall submit a report to the CQA Lieutenant monthly:

- The number and type of requests for ADA Accommodations;
- The number and type of approved requests for ADA Accommodations;
- The number and type of rejected requests for ADA Accommodations, with the reasoning behind the rejection(s);
- The number and type of ADA-related grievances;
- Timeliness of response to ADA Accommodation Requests and ADA Grievances
- ADA-related training provided to staff with proof of completion(s);
- Use of the ADA Tracking System"

The Expert shared a sample methodology template for the County to consider when drafting the monitoring of ADA compliance.

The County has not produced the Wellpath policies and procedures for monitoring compliance with ADA requirements and Jail ADA policies.

The County must provide proof of practice during the next monitoring tour that the ADA Coordinator is conducting monitoring as required by the policy and *Murray v. Santa Barbara County* Remedial Plan.

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) and confirmed the policy includes written policies and procedures for the County to monitor compliance with requests for ADA accommodations and ADA grievances. However, the County did not produce proof that it monitors requests for ADA accommodations or ADA grievances.

The Custody Operations policy also includes written policies and procedures for the County to monitor compliance with the ADA-related training and the ADA Tracking System. However, the County did not produce proof of practice that it monitors ADA-related training or the ADA Tracking System.

To reach substantial compliance with provision 5.R.1, the County must:

- Develop and implement policies and procedures (monitoring tool including methodology) for monitoring compliance with ADA requirements and Jail ADA policies, and ensure these policies include the RP requirements.

5.R.2. The County shall develop an ADA accountability plan that will ensure quality assurance, track violations of the ADA and the Jail's ADA policies, and establish staff accountability for egregious, serious, or repeated violations of the ADA and Jail ADA-related policies and procedures.

Compliance Rating: Partial Compliance

Prior Compliance Rating: Partial Compliance

County Response:

The County reports it is in the process of fully implementing this provision. In the next four months, the County will consult the ADA Expert regarding development of an ADA accountability plan as required by this provision.

Analysis/Observations

The Expert reviewed the revised Custody Operations Americans with Disabilities Act (ADA) Policy Section 209 (Revised 04/2024) to confirm the policy includes an ADA accountability plan covering *Murray* Remedial Plan requirements, including quality assurance, tracking of violations of the ADA, and the Jail's ADA policies, and establishes staff accountability for egregious, serious, or repeated violations of the ADA and Jail ADA-related policies and procedures. The policy states, "The ADA Coordinator shall review grievances and/or reports related to violations of the ADA and/or egregious, serious, or repeated violations of the ADA and/or Jail ADA-Related policies and procedures and shall report those instances to the CQA Lieutenant. The CQA Lieutenant shall review all incidents provided by the ADA Coordinator and shall consider whether the incident shall be investigated, addressed with the staff member informally, or whether the incident shall be forwarded to Professional Standards for investigation related to violation of policies and procedures."

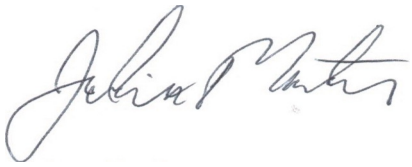
The County has not produced the Wellpath/health care ADA accountability plan for the Expert's review.

To reach substantial compliance with provision 5.R.2, although the Custody policy has been revised, the County must:

- Implement the SBSO ADA accountability plan to ensure quality assurance, track violations of the ADA and the Jail's ADA policies, and establish staff accountability for egregious, serious, or repeated violations of the ADA and the Jail's ADA-related policies and procedures.
- Ensure Wellpath develops and implements an ADA accountability plan that ensures quality assurance, tracks violations of the ADA and the Jail's ADA policies, and establishes staff accountability for egregious, serious, or repeated violations of the ADA and the Jail's ADA-related policies and procedures.

Signature

Submitted on behalf of Sabot Technologies, Inc. dba Sabot Consulting to the County of Santa Barbara, and Santa Barbara County Sheriff's Office



October 13, 2026

Julian Martinez
Director
Sabot Consulting

Date