



Michael R. Barnett
Undersheriff

San Diego County Sheriff's Department

William D. Gore, Sheriff



July 26, 2019

Honorable Peter C. Deddeh
Presiding Judge of the Superior Court
San Diego Central Courthouse
1100 Union Street
San Diego, CA 92101

Dear Judge Deddeh:

Response to San Diego County Grand Jury Report: "San Diego County Detention Facilities- Inspection Report and Inmate Mental Health" Dated May 28, 2019.

Pursuant to California Penal Code section 933(c), the following is my response to the Grand Jury's Findings and Recommendations 19-20 through 19-22.

SAN DIEGO COUNTY SHERIFF'S DEPARTMENT

Grand Jury Finding 01:

A preventable suicide risk exists at South Bay Detention Facility.

Response:

The Sheriff's Department disagrees in part with the finding. Not all suicides can be prevented, as noted by the Grand Jury's citation to an inmate using food to suffocate himself. However, the Sheriff's Department is constantly trying to minimize the mechanisms that an inmate might utilize to attempt suicide. The Department agrees that altering the vents, in individual cells, by reducing the diameter of the ventilation opening from a half inch square to a hole three sixteenths of an inch would make it more difficult for an inmate to utilize the vent to commit suicide.

RECOMMENDATION 19-20:

The 2018/2019 San Diego County Grand Jury recommends that the San Diego Sheriff's Department:

As soon as possible replace or modify the vent covers at South Bay Detention Facility (using 24-hour emergency purchasing procedures) to prevent further loss of life.

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Response:

The recommendation is being implemented. The project to replace the vent covers has been assigned to a Sheriff's project manager. We estimate the project will be completed by September 30, 2019.

Grand Jury Finding 02:

The San Diego County Sheriff's Department provides mental health treatment to an increasing number of inmates, some of whom could be better rehabilitated in other facilities.

Response:

The Sheriff's Department disagrees in part with this finding. The Sheriff's Department agrees that it provides mental health services to an increasing number of inmates. However, we disagree with the Grand Jury's finding that some inmates could be better rehabilitated in other facilities.

The Sheriff's Department has allocated mental health personnel in all detention facilities. We continue to expand our mental health services for those who are legally required to remain in our custody, and we facilitate the transfer of those legally ordered to other mental health facilities within the State of California.

In our continuing efforts to expand and strengthen our mental health care, the Sheriff's Department instituted the Inmate Safety Program (ISP) as a means to identify at risk individuals who require intervention, placement in appropriate housing, continued observation, assessments, and treatment. Additionally, the San Diego Sheriff's Department and Liberty Healthcare have partnered with the California Department of State Hospitals to develop a Jail-Based Competency Treatment (JBCT) program. It is a 30-bed program designed to "restore to competency" felony inmate-patients who are found Incompetent to Stand Trial (IST) so that their cases may proceed to trial.

JBCTs were developed in response to long wait times for IST inmate-patients to be admitted to the State Hospitals. Prior to JBCTs, these inmate-patients were waiting long periods of time in county jail without competency training and with fewer resources available to them. With the patients remaining in local custody, the JBCT program is able to better work with the defense bar, the District Attorney's Office and the courts to assist with the patient's legal understanding and psychiatric care.

RECOMMENDATION 19-21:

The 2018/2019 San Diego County Grand Jury recommends that the San Diego Sheriff's Department:

Study and consider the decision made by the Los Angeles County Board of Supervisors to centralize mental health treatment of inmates.

Response:

The recommendation has not yet been implemented but will be implemented in the future. The study of the centralization of mental health treatment of inmates in Los Angeles County has been assigned to a Sheriff's lieutenant. We estimate the study to be completed within 90 days.

Grand Jury Finding 03:

The older facilities were not designed for inmates serving long sentences and are outdated for current use.

Response:

The Sheriff's Department agrees with this finding. Our Las Colinas Detention and Reentry Facility is the only one of our seven facilities built within the past twenty years. Its design utilized the latest in detentions design elements and supports our post criminal justice realignment population. All the other detention facilities are at least twenty years old; however, they were considered state of the art at the time they were built. Over a period of time, advancements in technology and design, coupled with a new older and more criminally sophisticated population, increase the rate at which facilities become outdated.

Due to the nature of their design and the materials used to achieve the necessary levels of security, retrofitting older facilities is challenging as well as costly. We take pride in maintaining our facilities to maximize their lifespan. At the same time, we look forward to the opportunity to design and build replacement facilities in the future.

Grand Jury Finding 04:

Several detention facilities, both adult and juvenile, are located at Otay Mesa, an isolated area which is difficult for families of inmates to visit.

Response:

The Sheriff's Department agrees with this finding.

RECOMMENDATION 19-22:

The 2018/2019 San Diego County Grand Jury recommends that the San Diego Sheriff's Department:

Study and consider transportation options for family visitation to the Otay Mesa detention facilities.

Response:

The recommendation will not be implemented. The Department recognizes the importance for inmates to maintain social connectedness with their families. In response, the Department recently made video visitation available in six detention facilities. The video visitation enhancement was implemented to ease barriers to visitation such as time, travel, and overall cost.

From May 2018 to May 2019, between our three facilities in Otay Mesa, we had approximately 45,000 social visits. Of those, approximately 13,000 were via video visitation. The use of this newly deployed technology continues to increase and we will evaluate the need for additional infrastructure to support potential expansion.

In addition to the Grand Jury's findings and recommendations, the Department would like to provide clarification to statements documented in the report.

In the ***Declining Inmate Numbers*** portion of the report, the Grand Jury stated, "With the exception of the Central Jail, all of the adult institutions the Grand Jury visited are currently under their maximum capacity and the number of inmates is steadily decreasing." In the ***Mental Health Concerns*** section, the Grand Jury also commented, "Reduced inmate population raises the question of how best to utilize facilities operating well below rated capacity." That information is inaccurate.

Our facilities have all been running near and at times over their Board of State and Community Corrections (BSCC) rated capacity. As a system, we intake several hundred new arrests per day. To manage these new arrestees, as well as changes in the housing needs for inmates already in custody, our system requires available beds. Our population does have a natural rise and fall, but it does not fall to the point where we develop bed-space utilization concerns.

In the ***Inmate Housing*** portion of the report, the Grand Jury stated, "Facility 8 and George Bailey Detention Centers are nearly identical in design." That information is incorrect. The George Bailey Detention Facility (GBDF) is the largest of all the facilities operating under the San Diego County Sheriff's jurisdiction. GBDF has six housing units, a medical area, an inmate processing area, a kitchen/staff dining room, and an administrative area. GBDF has a BSCC rated capacity of 1,380 inmates. Facility 8 can be considered an extension of GBDF and is the mirror image of just one cell housing unit found at GBDF. Facility 8 has a BSCC rated capacity of 200 inmates.

The Grand Jury also commented about the Las Colinas Detention and Reentry Facility (LCDRF) and stated, "This is the newest County detention facility and is modeled after a college campus." This statement is not accurate. Although LCDRF may have some characteristics of an open campus, it was not modeled after a college campus. LCDRF was designed around the latest evidence based corrections designs along with implementation of new operational philosophies. Additionally, LCDRF does not have beds dedicated to competency restoration. LCDRF does have 32 certified Lanterman-Petris-Short (LPS) beds, which sometimes are used for restoration needs.

In the ***Mental Health Concerns*** portion of the report, the Grand Jury mentioned the County of Los Angeles facing a similar challenge of caring for the mental health of a large number of inmates and their board of supervisors voting in favor of a mental health treatment center able to house 3,800 patients. Although this portion is referencing the County of Los Angeles, it is important to also note the cost of replacing the men's central jail with a mental health facility. The contract to design and build the mental health facility is \$2.2 billion.

The San Diego Central Jail (SDCJ) sixth floor houses a combination of inmates in Enhanced Observation (20 beds), Outpatient Stepdown (80 beds) and our Jail Based Competency Treatment module (30 beds). The Psychiatric Stabilization Unit is located on the third floor and has 30 rated beds. Mental health professionals are indeed in high demand. Our Department has been fortunate to not have retention issues specific to our mental health clinicians. We have seen some turnover with our contracted psychologists and psychiatrists, which may be what the Grand Jury was alluding to with their statement concerning, *"the shortage of psychiatric professionals is a growing nationwide problem."*

In ***The Reality of Suicide*** portion of the report, the Grand Jury cited, *"Suicide is a leading cause of death among inmates in local jail in the United States."* Suicide is not a concern unique to the custodial environment. It is a societal concern and per a report by the San Diego County Health and Human Services Agency is the 9th overall leading cause of death in San Diego County. Our department sought out Dr. Colleen Kelly to provide an independent review of our in custody suicides. Dr. Kelly disagreed with the method used to calculate and compare our systems with others. Based on a variety of unique factors within systems, comparing the number of suicides is problematic. Some of the highlights of her report point out, *"The ADP (Average Daily Population) is an inadequate statistic to compare jail and local populations...using the at risk suicide calculations, a San Diego jail inmate is about ½ as likely to die by suicide than the average San Diego resident. Thus, suicide rates are actually much lower in the San Diego Jail than in the general population..."*. Dr. Kelly's report is attached for reference.

In the ***Other Issues*** portion of the report, the Grand Jury reported that due to terms in the maintenance contract for body scanners, the County is prevented from acquiring software to update the scanners. The Department acknowledges that body scanner equipment is outdated; however, that is mainly due to new technologies as opposed to the lack of software updates. The Department is looking at purchasing new equipment, but in order to do so must first identify funding and go through the formal purchasing process.

The ***Other Issues*** portion of the report also includes information concerning recreation yard designs. The roof at SDCJ has never been, nor was it designed as a recreation yard. That was a design element at the old Central Detention Facility, which SDCJ replaced in 1998. Our South Bay Detention Facility (SBDF) is the only facility where the recreation area is fully enclosed. SBDF is located under the South Bay Court House and its design is prohibitive to expansion or renovation. We are working towards opening the Rock Mountain Detention Facility, at which point we will plan to transition out of South Bay. All the recreation yards at Vista Detention Facility have an open ceiling enabling all inmates to see the sky and be in the fresh air.

Finally, in the *Rehabilitation and Reentry* section the Grand Jury mentioned our Food Services Division Central Production Plant. Their output is indeed in the thousands of meals per week, based on daily production numbers, the weekly mark is nearly 130,000.

In closing, I would like to thank the Grand Jury for their efforts in working with the Sheriff's Department through this inspection.

If further clarification or additional discussion is needed, please feel free to contact Captain Alan Kneeshaw of the Detention Support Division at (858) 974- 2105.

Sincerely,



William D. Gore, Sheriff

WDG:agk

cc: Members, Board of Supervisors
Helen Robbins-Meyer, CAO
David Hall, Director, Clerk of the Board
Rose Marie Orcino Madruga, Foreperson, San Diego County Grand Jury

Attachments:

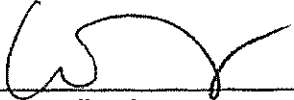
Review and Critique of the Disability Rights California Report 04/06/18: Dr. Colleen Kelly, Ph.D.

Works Cited:

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REVIEW AND CRITIQUE OF THE DISABILITY RIGHTS CALIFORNIA'S REPORT
SUICIDES AT SAN DIEGO COUNTY JAIL: A SYSTEM FAILING PEOPLE WITH
MENTAL ILLNESS

Expert Report by:
Colleen Kelly, Ph.D.



Colleen Kelly, PhD
Statistical Consultant

4/6/18

Date

Suicides at San Diego County Jail: A Crisis by Any Measure?

Disability Rights California (DRC) report "Suicides at San Diego County Jail: A System Failing People with Mental Illness" [1] uses a statistical analysis to support the premise that the San Diego County jail system has "a crisis by any measure." The analysis, however, uses comparisons that appear to be specifically chosen to support the desired conclusion. Furthermore, the method used to calculate the suicide rate does not yield a meaningful measure and is not appropriate for comparisons across diverse counties. Using a more appropriate method to calculate suicide rates and more complete data yields a completely different conclusion. We conducted a rigorous statistical analysis of the suicide data from the ten largest California County jail systems using a suicide rate calculation that yields "more appropriate comparison[s]" (BJS Special Report [2]) and find that San Diego jail system is, in fact, similar to other California counties and that its suicide rate is not the highest rate (see Figure 1). Thus, one cannot conclude that San Diego jail system has "a crisis by any measure".

INMATES AT RISK SUICIDE RATES

Standardized to the average racial distribution, 2010-2017

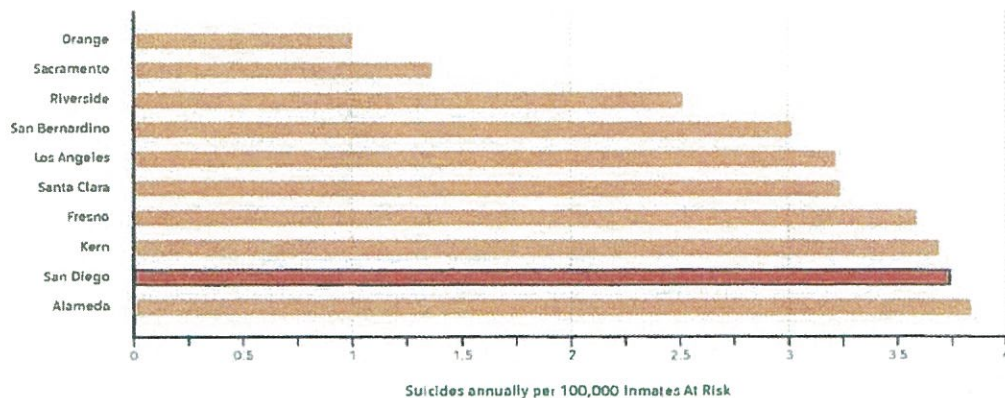


Figure 1: A comparison of the suicide rates (standardized inmates at risk calculation) of the ten largest California counties for 2010-2017.

What Measure is Appropriate to Compare Suicide Rates?

The DRC report states [1 p. 3] "San Diego County Jail has the highest reported incidence of suicides in the California Jail System over several years – more than 30 suicide deaths since 2010". Actually, Los Angeles County had the highest reported number of suicides in this period (34), according to data obtained in a California Public Records Act Request for Records. More importantly, comparing the number of suicides across jail systems is not appropriate because the jail systems are of different sizes, with different numbers of inmates. The largest jail systems will generally have the largest numbers of suicides. Calculating a suicide rate (the number of suicides divided by the number of inmates in the jail system) is a more fair method to compare the jail systems. Suicide rates are generally calculated as the average number of suicides per year per 100,000 inmates at

risk. In fact, this is the definition of the incidence of suicide: the average number of suicides per year divided by the number of inmates at risk (the "at-risk rate").

The DRC report also compares the suicide rate of San Diego to other California jail systems, but they use the average daily population (ADP) of the jail system as the denominator (the ADP suicide rate) rather than the number of inmates at risk. Unfortunately, the ADP suicide rate has several flaws that make it inappropriate for comparing diverse jail systems. The *Bureau of Justice Statistics Special Report on Suicide and Homicide in State Prisons and Local Jails* [2] mention that the ADP suicide rate methodology is less desirable than the at-risk rate (p.11), but concede that the ADP rate has been used historically when data to calculate the at-risk rate was unavailable. Other researchers [3, 4, 5 (p.28), 6 (p. 187), 7, 8 (p. 418)] have also pointed out the methodological flaws with the ADP calculation of the suicide rate.

Why is an ADP Suicide Risk an Inappropriate Comparison?

The ADP suicide rate yields a statistic that is not easily interpretable. The interpretation of the at-risk suicide of San Diego in the period 2010-2017 of 3.7 suicides per 100,000 inmates is: on average 3.7 out of 100,000 inmates committed suicide per year. Since San Diego had an average of 92,000 inmates per year during this period (close to the 100,000 inmates in the statistic), the suicide rate is only slightly lower than the average number of suicides per year (3.9 suicides per year).

The ADP suicide rates quoted in the DRC report (106, 120 and 94 suicides per 100,000 inmate-years for 2014, 2015 and 2016, respectively), however, yield suicide numbers that are approximately 20 times larger than the actual numbers of suicides in these years (6, 6, and 5, respectively), and are more than 3 times larger than the number of suicides in the entire period 2010-2017 even though there were more than 700,000 inmates in the system during this period. We note that the DRC consistently reports ADP rates per 100,000; the units of the statistic are not given, but they should be inmate-years.

How can the ADP suicide rate yield numbers that are so high as to be incongruous with the data? The ADP suicide rate is calculated using a denominator of an inmate-year. An inmate-year consists of one inmate in the jail system for an entire year. Most inmates stay in the San Diego jail system much less than an entire year; in fact, the average length of stay for 2011-2017 is just 22 days [9]. So how do you get an inmate-year? Inmates with shorter lengths of stay are effectively strung together to make an inmate-year. Twelve inmates serving 30 days each would constitute one inmate-year. With an average length of stay of just 22 days, San Diego would require on average $365/22 = 16.6$ inmates strung together to make up each inmate-year in the denominator of the ADP suicide rate. This methodology leads to the absurd conclusion that there can be multiple suicides within each inmate-year; the conclusion is particularly absurd when the unit is expressed as just an inmate, as it is done in the DRC report. This is also why the ADP suicide rates are approximately 17 times the at-risk suicide rates.

The ADP suicide rate is especially flawed when used to make comparisons across jail systems with different length of stay distributions. Comparing San Diego, with an average length of stay of 22 days, to Los Angeles, with an average length of stay of 56 days [9], is problematic. San Diego requires approximately 17 inmates strung together to make up each inmate-year; whereas Los Angeles requires only an average of 6.5 inmates to make up each inmate-year. This attribute of the ADP suicide rate inflates the San Diego rate two and one-half times as much as it inflates the Los Angeles rate. It is for these reasons that Crighton and Towl [6] (p.188) conclude "It is essential that

such comparisons not be made in unreflective and mechanistic ways such as using ADP rates comparing two samples with very different characteristics.”

To estimate one inmate-year with a number of inmates with short lengths of stay requires the assumption that the risk of suicide in days 300-330 for an inmate serving a full year is the same as the risk of suicide in days 1-30 for an inmate with a short length of stay. Since most suicides occur within the first 30 days of incarceration [2], this assumption is clearly untenable.

Are San Diego jail inmates 5 times more likely to die as an inmate in the California’s State prison system and 8 times more likely to die by suicide than the average San Diego County resident?

These DRC statements [1 p.4] come from a comparison of the ADP suicide rates in the three-year period (2014-2016) in which San Diego jail system had an unusually high number of suicides. Further, the ADP suicide rate can be severely biased in comparisons of jail and prison populations, as discussed in Metzner [3] and O’Toole [4]. This bias is due to a significantly larger number of at-risk inmates in the jail versus the prison, even when they have the same ADP. This bias leads to much higher suicide rates in local jails than in State prisons when using the ADP methodology: in 2002, the national ADP suicide rate in local jails was over 3 times the rate in State prisons [2]. The specific ratio of jail and prison ADP suicide rates will depend on the ratio of the required number of inmates to make an inmate-year for the jail and prison systems. Since this ratio is dependent on the average length of stay in the jail and prison systems, it is an inappropriate measure to compare the risk of suicides in jails and prisons.

For similar reasons, the ADP is an inadequate statistic to compare jail and local populations. As discussed above, the inmates at risk in the San Diego jail system is approximately 17 times as large as the ADP. For the local population, the number of people at risk is the same as the ADP (assuming that the population is relatively stable). Using the at-risk suicide rate calculation, a San Diego jail inmate is about one-half as likely to die by suicide than the average San Diego resident [10, 11]. Thus, suicide rates are actually much lower in the San Diego jail than in the general population, a strikingly different conclusion than that reached by DRC.

As discussed in the BJS Special Report [2], the demographics of inmate populations do not reflect those of the resident population; inmates are predominately male and younger than in the general population, two characteristics that lead to higher suicides rates. To improve the comparison of suicide risks, the resident populations can be standardized by age, race and gender to match the proportions seen in jails. When resident suicide rates are standardized, a San Diego jail inmate is even less likely to die by suicide than the average San Diego resident.

Why Should Suicide Risks be Standardized?

The demographics of inmate populations also differ across the California jail systems. San Diego has the highest percentage of white inmates (46%) of all the 10 largest jail systems in California for the period 2010-2016 (based on arrest data [12]). Los Angeles had the lowest percentage, with 21% white inmates. These racial discrepancies are important because white inmates are 6 times as likely to commit suicide as African American inmates and 3 times as likely to commit suicide as Hispanic inmates [2]. Discrepancies in racial distributions alone could contribute to a higher calculated suicide rate in San Diego. To fairly compare these ten counties, we standardize the rates (as recommended by the BJS [2]) to the same racial distribution. Specifically, we standardize each jail system’s suicide rates to the average racial proportions of the ten counties.

What years and counties should San Diego be compared to?

The primary comparison of jail inmate suicide rates presented in the DRC report [1 Figure on p. 3] is for the period 2014-2016, comparing San Diego to five other “similarly sized California counties”. Why are these three years used rather than the 2010-2017 period discussed at the top of the page? The set of years compared appears to be cherry-picked to support the desired conclusion. Page 4 of the report contradictorily states: “suicide rates are most meaningful when viewed over a sustained period of time.” Metzner [3] recommends an assessment of the adequacy of a suicide prevention program be assessed over at least a five-year period. Our analysis covers the period 2010-2017. We include the largest 10 California county jail systems and show that San Diego’s suicide rate is similar to other California county jail systems and that it is not statistically significant from the average.

Causal Interpretations (Are the USA Winter Olympics Training Programs in Crisis?)

The DCR report compares the suicides rates of the San Diego jail system to (1) other California county jail systems, (2) to the California prison system, (3) to the national jail suicide rate, and (4) to the general San Diego population. All of these comparisons are based on the ADP suicide rate, which has several serious flaws as discussed above. However, there are other differences in these populations that make for unfair comparisons. To conclude that there is a crisis in the suicide prevention policies would require a fair (apples-to-apples) comparison and a demonstration of a correlation between suicide prevention policies and suicide rates. The suicide prevention policies of the different jail systems are not discussed or compared; thus, concluding that the cause of the differences in suicide rates is due to policy is pure speculation.

To illustrate the flaws in the logic of concluding that there is a suicide prevention policy problem based solely on a discrepancy in suicide rates, we revisit the 2018 Winter Olympics. With a total of 39 medals, Norway dominated the 2018 Winter Olympics, surpassing the USA’s total of 23 medals. Calculating a per-capita medal rate increases the discrepancy in the medal-win rates for the two countries. Yet, no one is calling the USA Winter Olympic Training Program a failure or “in crisis”. Why not? If we use the same logic used in the DRC report, we should conclude that the lower win rate in the USA must be the result of a failed training program.

Most winter sports enthusiasts recognize that there are discrepancies between the two countries (such as genetics and cultural differences that encourage more winter Olympics athletes), which are more likely to account for the differences in medal wins.

Similarly, when comparing San Diego Jail inmates to inmates in other California counties, the California prison system, the national jail system or to San Diego County residents, one should recognize that cultural, demographic, and length-of-stay differences between these populations may explain the differences in suicide rates. To attribute the differences in suicide rates to policies requires a rigorous effectiveness analysis that correlates suicide rates to policies.

A Crisis by Any Measure or a Propagation of Statistical Errors?

The statistics cited in the DRC report originated in a series of *CityBeat* articles published by Kelly Davis. These statistics were then replicated in the Grand Jury Report [9] and in the DRC report [1]. Kelly Davis began her critique of San Diego’s jail system using suicide numbers and then compared the ADP suicide rate to other counties. San Diego Sheriff’s Department spokesperson Jan Caldwell pointed out the flaw in comparing ADP suicide rates in 2013 [10], yet Kelly Davis insisted upon

using the flawed ADP calculation in her articles because “San Diego County fares much better” using the at-risk rate calculation [11]. It is unfortunate that the ADP risk measure was originally chosen on the basis of how it makes San Diego look in comparison to other counties rather than on its inherent attributes and biases. The fact that the error has been replicated by other authors demonstrates a crisis in statistical understanding.

A rigorous statistical analysis of the effectiveness of the San Diego Jail system suicide prevention policy would have the following components:

1. The at-risk suicide rate calculation should be used instead of the ADP calculation. Comparing the average daily population (ADP) suicide rates across jails with differing numbers of inmates at risk is not a fair comparison; one should expect higher numbers of suicides in jails with larger numbers of inmates at risk.
2. The set of California counties and the set of years compared should not be cherry-picked to support the desired conclusion.
3. Comparisons across jail systems with diverse inmate populations should account for that diversity when it affects the suicide rates; specifically, because Caucasians, African Americans and Hispanics have drastically different suicide rates, the racial distribution of each jail system should be accounted for in the comparison.
4. The imprecision in estimating suicide rates using small numbers of suicides should be acknowledged; a statistical comparison that clearly demonstrates the errors in estimation should accompany any comparison of rates.
5. Inferring that the cause of a difference in suicide rates is due to the suicide prevention policy requires at a minimum a demonstration of the correlation of suicide prevention policies and lower suicide rates.

Our analysis estimates the suicide rates (per 100,000 inmates at risk) of the ten largest California county jail systems, standardized to the average racial distribution. We also estimate the 95% confidence intervals for the suicide rates (see Figure 2). Our statistical analysis shows that San Diego does not have the largest suicide rate and that its rate is not statistically different than the average rate. The only county that is statistically significantly different than the average is Orange County, which has a lower rate than the average.

INMATES AT RISK SUICIDE RATES

Standardized for average racial distribution, 2010-2017

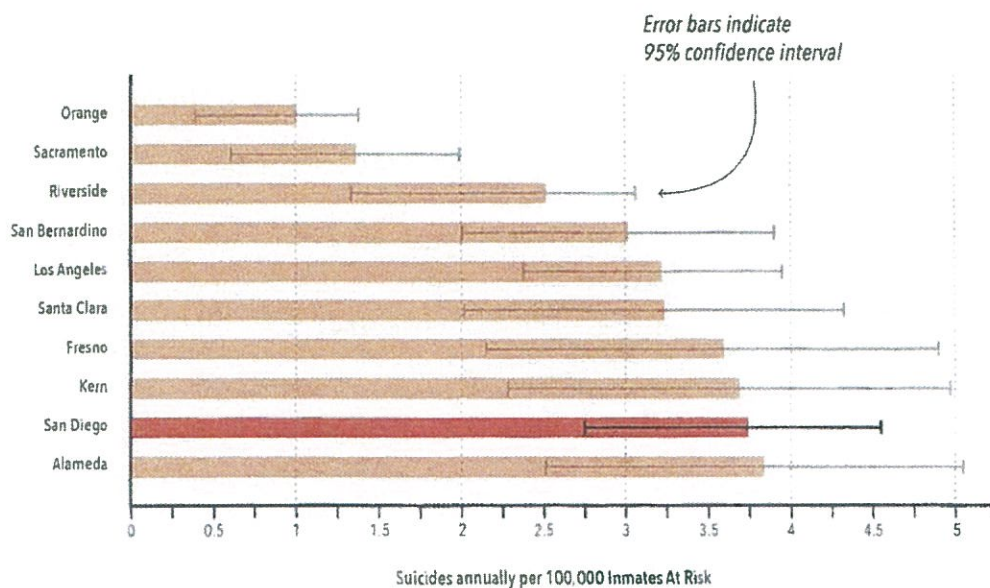


Figure 2: A comparison of the suicide rates (standardized inmates at risk calculation) of the ten largest California counties for 2010-2017. Error bars represent the 95% confidence intervals for the suicide rate estimates. Only Orange county has a suicide rate that is statistically significantly different than the average.

Because the DRC report uses inappropriate statistics and does not conduct a statistical comparison of the rates and a more rigorous analysis (see Figure 2) finds that San Diego has a suicide rate similar to other California county jail systems, one cannot conclude that there is “a crisis by any measure” in San Diego County jail system.

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