

ICE Detention Standards Compliance Review

Tri-County Justice and Detention Center

March 4-6, 2008

REPORT DATE – March 9, 2008



Contract Number: ODT-6-D-0001
Order Number: HSCEOP-07-F-01016

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Making a Difference

March 9, 2008

MEMORANDUM FOR: Gary E. Mead
Acting Director
Office of Detention and Removal

FROM: (b)(6) (b)(7)c [Redacted] for (b)(6) (b)(7)c [Redacted]
Reviewer-In-Charge
Creative Corrections

SUBJECT: Tri-County Justice and Detention Center Annual Review

Creative Corrections conducted an Annual Detention Review (ADR) of the Tri-County Justice and Detention Center, located in Ullin, IL on March 4-6, 2008. The facility is owned by the County of Pulaski and has an Intergovernmental Services Agreement with the United States Marshals Service (USMS). The GEO Group, Inc, manages the facility. As noted on the attached documents, my team of Subject Matter Experts (SME) included: (b)(6) (b)(7)c [Redacted] Health Services; (b)(6) (b)(7)c [Redacted] Security; (b)(6) (b)(7)c [Redacted] Safety; and (b)(6) (b)(7)c [Redacted] Food Services.

A closeout meeting which included a discussion of all deficiencies, concerns, and recommendations noted during our review was conducted with Warden (b)(6) (b)(7)c [Redacted] Ernest Dixon, GEO Group Inc. - Director of Operations, Gayla Jones, Pulaski County Contract Monitor, Dan Boyd, GEO Group Inc. - Health Care Representative, and (b)(6) (b)(7)c [Redacted] ICE Deportation Officer, on March 6, 2008.

Life Safety Findings

There were no life safety findings at the Tri-County Justice and Detention Center.

Type of Review:

This review is a scheduled Detention Standards Review to determine general compliance with established ICE National Detention Standards for facilities used for over 72 hours.

Review Summary

The Tri-County Justice and Adult Detention Center is not currently accredited by any correctional or health organization.

Standards Compliance

The following statistical information provides a direct comparison of the 2007 ADR and this ADR conducted for 2008.

March 6-7, 2007 Review

Compliant	37
Deficient	0
At-Risk	0
Not-Applicable	1

March 4-6, 2008 Review

Compliant	37
Deficient	0
At-Risk	0
Not-Applicable	1

RIC Issues and Concerns**Access to Legal Materials**

The facility should post the listing of materials in Attachment "A" in the law library.

Visitation

The facility should develop procedures for examinations by independent medical service providers and experts.

Correspondence and Other Mail

The facility needs to forward detainee's original identity documents to ICE. These documents are currently being placed in the detainee's personal property.

Food Service

- The current common-fare menu needs a nutritional analysis completed and kept on file.
- The sanitizer being used needs to be tested with a chlorine test kit for the correct concentration level in the third sink and directions posted for staff and detainees to follow. The sanitizer should only be used in the dishwashing machine when the final rinse temperature is not maintained at 180 degrees. This will prevent chlorine vapors from forming and from any person becoming exposed to them.

Funds and Personal Property

- The personal property inventory form needs to be revised to meet ICE standards to include a signature block for the detainee.
- Two officers need to be present during the processing of detainee funds and valuables during in processing to the facility. Both officers and the detainee should sign the receipt for detainee funds.
- The envelope used to keep the funds and receipt needs to be completed in accordance with TCDC 12. A pre-printed envelope with required information would ensure that all requirements are met.
- The facility should develop a written procedure that requires the prompt forwarding of abandoned property to ICE.

Detainee Grievance Procedures

The facility policy needs to address that staff are required to forward any grievance that involves officer misconduct to ICE.

Issuance and Exchange of Clothing, Bedding, and Towels

Policy TCDC-16.001 needs to address a daily exchange of socks and undergarments rather than an exchange of three times weekly.

Access to Medical Care

- Current Health Services staffing levels should be reviewed to ensure adequate staffing is available to carry out the current mission.
- PPD testing should be completed within one business day of the detainee's arrival. The E-Book does not require completion within one business day; however the checklist requires completion within one business day.

Hunger Strikes

The facility should develop written plans to treat a detainee who is on a hunger strike.

Suicide Prevention and Intervention

Room number 11 contains two metal handicap grab bars, which could be utilized in a suicide attempt and should not be used to house a detainee who is placed on suicide watch.

Contraband

- The facility should establish an evidence locker for illegal contraband.
- The facility should place illegal contraband (evidence) in an approved evidence bag, complete the chain of custody and store the item in the evidence locker.
- The facility should create a logbook to keep inside the evidence locker noting the time and date of entry into the locker, the person's name, the reason for entry and the time the locker is secured.
- The facility should use the Confiscation and Disposition of Contraband form and ensure that a copy is placed in the detainee's file.

Disciplinary Policy

The facility should establish written procedures in TCDC policy 10.001 (Inmate Discipline), which governs the handling of confidential informant information.

Emergency Plans

The facility should detail a map within the TCDC Emergency Plans folder that identifies the locations of shut-off valves and switches for all utilities.

Environmental Health and Safety

- TCDC-09.002, Fire Safety, Section F3 needs to be revised to allow for the appropriate storage of flammable liquids.
- The facility should ensure that vents in housing unit pods are not blocked.
- The facility needs to forward their Fire Plan to the State Fire Marshal or designated fire authority for review and approval.
- The facility needs to improve the barber operations. The five-clipper sets that were inspected need to be thoroughly cleaned including the attachments, and storage boxes. There needs to be a designated area for cutting hair with at least one sink with hot and cold running water. One clean towel is required per customer. The requirement is that hair cutting sanitation standards be posted in the barbershop.
- The facility needs to establish written standard cleaning procedures.
- There is very little documented history of activities such as chemical inventories, inspections, and fire drills. Approximately two months of these records exist. Records must be consistently maintained to develop a documented history of these activities.

- The facility needs to install a “Sprinkler shut off” sign on the riser access door near the emergency generator.
- The facility needs to install permanent eye wash stations in identified locations.

Key and Lock Control

- The facility needs to establish a preventative maintenance program and ensure that key and locking devices are inspected monthly.
- The facility should dispose of old keys having an unknown function that are currently stored in the key cabinet.

Population Counts

- The facility should develop and implement a procedure to ensure that detainees are not talking loudly or walking around and that the television volume is lowered during a formal count.
- The facility should develop and implement a procedure that ensures that all housing blocks are counted simultaneously during a formal count.
- The facility should identify a housing unit to house the female detainees rather than use the booking area as the female housing area.

Security Inspections

The facility should design a sally port for the Special Management Unit.

Transportation

- The facility should provide protective vests for all transporting officers.
- The facility should establish procedures to ensure that vehicle inspection forms are completed appropriately.
- Numerous transport vans have excessive mileage. For staff and detainee safety, it is recommended that the facility consider obtaining new transport vans.

Staff/Detainee Communications

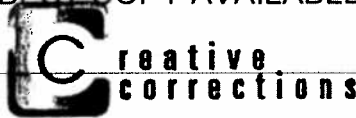
The facility should post scheduled visits by ICE staff in ICE detainee areas.

Recommended Rating and Justification

It is the Reviewer-in-Charge (RIC) recommendation that the facility receive a rating of "Acceptable."

RIC Assurance Statement

All findings of this review have been documented on the Detention Review Worksheet and are supported by the written documentation contained in the review file.



DETENTION FACILITY INSPECTION FORM

FACILITIES USED LONGER THAN 72 HOURS

A. TYPE OF FACILITY REVIEWED

<input type="checkbox"/>	ICE Service Processing Center
<input type="checkbox"/>	ICE Contract Detention Facility
<input checked="" type="checkbox"/>	ICE Intergovernmental Service Agreement

B. CURRENT INSPECTION

Type of Inspection	
<input type="checkbox"/>	Field Office
<input checked="" type="checkbox"/>	HQ Inspection
Date[s] of Facility Review	
March 4-6, 2008	

C. PREVIOUS/MOST RECENT FACILITY REVIEW

Date[s] of Last Facility Review	
March 6-7, 2007	
Previous Rating	
<input type="checkbox"/>	Superior
<input type="checkbox"/>	Good
<input checked="" type="checkbox"/>	Acceptable
<input type="checkbox"/>	Deficient
<input type="checkbox"/>	At-Risk

D. NAME AND LOCATION OF FACILITY

Name	
Tri-County Justice and Detention Center	
Address	
1026 Shawnee College Road	
City, State and Zip Code	
Ullin, Illinois 62992	
County	
Pulaski	
Name and Title of Chief Executive Officer (Warden/OIC/Superintendent)	
██████████ Warden	
Telephone Number (Include Area Code)	
618-845-3512	
Field Office / Sub-Office (List Office with Oversight)	
Chicago Field Office	
Distance from Field Office	
365 miles	

E. CREATIVE CORRECTIONS INFORMATION

Name of Inspector (Last Name, Title and Duty Station)	
██████████ / RIC / Creative Corrections	
Name of Team Member / Title / Duty Location	
██████████ / SME / Creative Corrections	
Name of Team Member / Title / Duty Location	
██████████ / SME / Creative Corrections	
Name of Team Member / Title / Duty Location	
██████████ / SME / Creative Corrections	
Name of Team Member / Title / Duty Location	
██████████ / SME / Creative Corrections	

F. CDF/IGSA INFORMATION ONLY

Contract Number	Date of Contract or IGSA
25-99-0135	8-30-2004
Basic Rates per Man-Day	
\$48.60	

Other Charges: (If None, Indicate N/A)
; ; ; <input checked="" type="checkbox"/> N/A
Estimated Man-days Per Year
81,166

G. ACCREDITATION CERTIFICATES N/A

List all State or National Accreditation[s] received:

H. PROBLEMS / COMPLAINTS (COPIES MUST BE ATTACHED)

The Facility is under Court Order or Class Action Finding	
<input type="checkbox"/>	Court Order
<input type="checkbox"/>	Class Action Finding
The Facility has Significant Litigation Pending	
<input type="checkbox"/>	Major Litigation
<input type="checkbox"/>	Life/Safety Issues
<input checked="" type="checkbox"/>	None

I. FACILITY HISTORY

Date Built	
1997	
Date Last Remodeled or Upgraded	
None	
Date New Construction / Bed Space Added	
None	
Future Construction Planned	
<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	No Date:
Current Bed space	Future Bed Space (# New Beds only)
230	Number: 16 Date:

J. TOTAL FACILITY POPULATION

Total Facility Intake for Previous 12 months
80,801
Total ICE Man Days for Previous 12 months
61,315

K. CLASSIFICATION LEVEL (ICE SPCs AND CDFs ONLY)

	L-1	L-2	L-3
Adult Male	16	104	34
Adult Female			

L. FACILITY CAPACITY

	Rated	Operational	Emergency
Adult Male	230	230	240
Adult Female	12	12	16
<input type="checkbox"/> Facility Holds Juveniles Offenders 16 and Older as Adults			

M. AVERAGE DAILY POPULATION

	ICE	USMS	Other
Adult Male	150	20	25
Adult Female	0	0	6

N. FACILITY STAFFING LEVEL

Security:	Support:
44	23

BEST COPY AVAILABLE

SIGNIFICANT INCIDENT SUMMARY WORKSHEET

In order for Creative Corrections to complete its review of your facility, you must complete the following worksheet prior to your scheduled review dates. This worksheet must contain data for the past twelve months. We will use this worksheet in conjunction with the ICE Detention Standards to assess your detention operations with regard to the needs of ICE and its detainee population. Failure to complete this worksheet will result in a delay in processing this report, and may result in a reduction or removal of ICE detainees from your facility.

INCIDENTS	DESCRIPTION	Jan – Mar	Apr – Jun	Jul – Sep	Oct – Dec
Assault: Offenders on Offenders ¹	Types (Sexual ² , Physical, etc.)	9 P	4 P	7 P	7 P
	With Weapon	0	0	0	0
	Without Weapon	0	0	0	0
Assault: Detainee on Staff	Types (Sexual Physical, etc.)	2 P	2 P	1 P	2 P
	With Weapon	0	0	0	0
	Without Weapon	0	0	0	0
Number of Forced Moves, incl. Forced Cell Moves ³		0	0	0	0
Disturbances ⁴		0	0	0	0
Number of Times Chemical Agents Used		0	1	0	0
Number of Times Special Reaction Team Deployed/Used		0	0	0	0
# Times Four/Five Point Restraints Applied/Used	Number/Reason (M=Medical, V=Violent Behavior, O=Other)	0	0	0	0
	Type (C=Chair, B=Bed, BB=Board, O=Other)	0	0	0	0
Offender / Detainee Medical Referrals as a Result of Injuries Sustained.		0	1	3	4
Escapes	Attempted	0	0	0	0
	Actual	0	0	0	0
Grievances:	# Received	4	3	1	13
	# Resolved in Favor of Offender/Detainee	0	0	0	0
Deaths	Reason (V=Violent, I=Illness, S=Suicide, A=Attempted Suicide, O=Other)	0	0	0	1
	Number	0	0	0	1
Psychiatric / Medical Referrals	# Medical Cases Referred for Outside Care	5	5	36	7
	# Psychiatric Cases Referred for Outside Care	0	9	9	7

¹ Any attempted physical contact or physical contact that involves two or more offenders
² Oral, anal or vaginal penetration or attempted penetration involving at least 2 parties, whether it is consenting or non-consenting
³ Routine transportation of detainees/offenders is not considered "forced"
⁴ Any incident that involves four or more detainees/offenders, includes gang fights, organized multiple hunger strikes, work stoppages, hostage situations, major fires, or other large scale incidents.

DHS/ICE DETENTION STANDARDS REVIEW SUMMARY REPORT

1. ACCEPTABLE		2. DEFICIENT		3. AT-RISK		4. REPEAT FINDING		5. NOT APPLICABLE							
LEGAL ACCESS STANDARDS										1.	2.	3.	4.	5.	
1.	Access to Legal Materials									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.	Group Presentations on Legal Rights									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.	Visitation									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.	Telephone Access									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
DETAINEE SERVICES															
5.	Admission and Release									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.	Classification System									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.	Correspondence and Other Mail									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8.	Detainee Handbook									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9.	Food Service									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10.	Funds and Personal Property									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	Detainee Grievance Procedures									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12.	Issuance and Exchange of Clothing, Bedding, and Towels									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13.	Marriage Requests									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14.	Non-Medical Emergency Escorted Trip									<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15.	Recreation									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16.	Religious Practices									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17.	Voluntary Work Program									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HEALTH SERVICES															
18.	Hunger Strikes									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19.	Medical Care									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20.	Suicide Prevention and Intervention									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
21.	Terminal Illness, Advanced Directives and Death									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
SECURITY AND CONTROL															
22.	Contraband									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23.	Detention Files									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24.	Disciplinary Policy									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25.	Emergency Plans									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
26.	Environmental Health and Safety									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
27.	Hold Rooms in Detention Facilities									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
28.	Key and Lock Control									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
29.	Population Counts									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
30.	Post Orders									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
31.	Security Inspections									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32.	Special Management Units (Administrative Detention)									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
33.	Special Management Units (Disciplinary Segregation)									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
34.	Tool Control									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
35.	Transportation (Land management)									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
36.	Use of Force									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
37.	Staff / Detainee Communication (Added August 2003)									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
38.	Detainee Transfer (Added September 2004)									<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ALL FINDINGS OF DEFICIENT AND AT-RISK REQUIRE WRITTEN COMMENT DESCRIBING THE FINDING AND WHAT IS NECESSARY TO REACH COMPLIANCE.															


RIC REVIEW ASSURANCE STATEMENT

By signing below, the Reviewer-In-Charge (RIC) certifies that:

All findings of non-compliance with policy or inadequate controls, and findings of noteworthy accomplishments, contained in this Inspection Report, are supported by evidence that is sufficient and reliable; and

Within the scope of this review, the facility is operating in accordance with applicable law and policy, and property and resources are being efficiently utilized and adequately safeguarded, except for any deficiencies noted in the report.

REVIEWER-IN-CHARGE

Reviewer-In-Charge: (Print Name) (b)(6), (b)(7)c	Signature 	(b)(6), (b)(7)c
Title & Duty Location RIC, Creative Corrections	Date 3-9-08	

TEAM MEMBERS

Print Name, Title, & Duty Location (b)(6), (b)(7)c, Medical SME - Creative Corrections	Print Name, Title, & Duty Location (b)(6), (b)(7)c, Security SME - Creative Corrections
Print Name, Title, & Duty Location (b)(6), (b)(7)c, Safety SME - Creative Corrections	Print Name, Title, & Duty Location (b)(6), (b)(7)c, Food Service SME - Creative Corrections

- RECOMMENDED RATING:**
- SUPERIOR
 - GOOD
 - ACCEPTABLE
 - DEFICIENT
 - AT-RISK

COMMENTS: The Tri County Justice and Detention Center staff was very receptive to the review team 's findings and recommendations and corrected many non-compliant areas immediately. There was very little documented history. Approximately two months of activities such as chemical inventories, inspections, and fire drills were available. Records must be maintained consistently to develop a documented history of these activities.

The facility should consider identifying another location for housing female detainees as they are currently being housed in the admissions/ booking processing area.

There was one County detainee death on 12-16-07. The preliminary cause of death was listed as acute double pneumonia. Toxicology and pathology reports were listed as pending and were not present in the file.

The facility administration needs to ensure that ICE standards are continually reviewed and followed and that practices continue to remain in compliance. The RIC concerns have been documented on the detention review worksheets.

MANAGEMENT REVIEW

Review Authority

THE SIGNATURE BELOW CONSTITUTES REVIEW AND ACCEPTANCE OF THIS REPORT BY THE REVIEW AUTHORITY. FOD/OIC/CEO WILL HAVE THIRTY (30) CALENDAR DAYS FROM RECEIPT OF THIS REPORT TO RESPOND TO ALL FINDINGS AND RECOMMENDATIONS.

HQDRO MANAGEMENT REVIEW: (Print Name) (b)(6) (b)(7)(C)	Signature (b)(6) (b)(7)(C)
Title Acting Chief, Detention Standards Compliance Unit	Date (b)(6) (b)(7)(C) 4-9-2008

- FINAL RATING:**
- SUPERIOR
 - GOOD
 - ACCEPTABLE
 - DEFICIENT
 - AT-RISK

COMMENTS: The Review Authority concurs with the recommended rating of "Acceptable". No Plan of Action is required, however, the Field Office is requested to address the following issues and concerns with the facility, as they could be problematic in the future:

- Access to Legal Material
- Visitation
- Correspondence and Other Mail
- Food Service
- Funds and Personal Property
- Detainee Grievance Procedures
- Issuance and Exchange of Clothing, Bedding, and Towels
- Access to Medical Care
- Hunger Strikes
- Suicide Prevention and Intervention
- Contraband
- Disciplinary Policy
- Emergency Plans
- Environmental Health and Safety
- Key and Lock Control
- Population Counts
- Security Inspections
- Transportation
- Staff Detainee Communication