

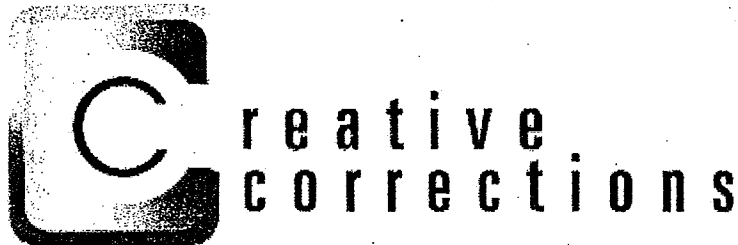
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# ICE Detention Standards Compliance Review

**Maverick County Jail**

June 3-4, 2008

REPORT DATE – June 11, 2008



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

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Creative Corrections  
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Beaumont, TX 77706

b6 [REDACTED] COTR  
U.S. Immigration and Customs Enforcement  
Detention Standards Compliance Unit  
801 I Street NW  
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June 11, 2008

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

FROM:

[REDACTED] b6, b7c  
Reviewer-In-Charge

fe [REDACTED] b6, b7c

SUBJECT: Maverick County Jail  
Headquarters Review (Under 72)

Creative Corrections conducted an initial Annual Detention Review (ADR) of the Maverick County Jail (DCJ), located in Eagle Pass, Texas, on June 3-4, 2008. The facility is owned by the County of Maverick and has an Intergovernmental Services Agreement with the United States Marshals Service (USMS). As noted on the attached documents, my team of Subject Matter Experts (SME) included: [REDACTED] b6 SME for Health Services; [REDACTED] b6, b7c SME for Security; [REDACTED] b6, b7c SME for Safety; and [REDACTED] b6 SME for Food Services.

A closeout meeting was held on June 4, 2008, and included a discussion of all deficiencies and observations noted during our review. Attending the meeting were Sheriff Tomas Herrera and Lt. [REDACTED] b6, b7c

### Facility History

The Maverick County Jail, Eagle Pass, Texas, was designed as a Direct Supervision Facility. The jail has two control stations (one in each pod) and houses 250 detainees. Security levels are low, medium, and maximum. The facility has 30 multi-occupancy cells and 20 separation cells. Additional areas include a small dispensary, an indoor recreation area, kitchen, laundry room, meeting room, outdoor recreation area, sallyport, property room and a booking area. The jail was constructed in two phases. Phase 1, which houses county & state inmates, was constructed in 1990. Phase 2, which houses U.S. Marshals' prisoners, was constructed in 2000.

### Type of Review:

This assessment is a special Detention Standard Review to determine the feasibility for using this facility to confine ICE detainees for under 72 hours. The ICE National Detention Standards for facilities used for less than 72 hours were utilized to evaluate the physical plant policies and procedures.

### Review Summary:

The Maverick County Jail is not currently accredited by the American Correctional Association (ACA), the National Commission on Correctional Health Care (NCCHC), or the Joint Commission on Accreditation of Healthcare Organizations (JCAHO).

## Standards Compliance:

The following information summarizes the findings of the feasibility review and no rating is recommended.

### RIC Observations

#### Detainee Handbook

The Maverick County Jail should develop a site-specific detainee handbook to serve as a guide to detention policies, rules, and procedures in effect at the facility and to outline opportunities available to detainees such as religious programming. The handbook should address the initial issue of clothing, bedding, and personal property; when a medical examination will be conducted; procedures governing telephone use (protocol when demand is high, direct / free telephone calling procedures, procedures for emergency calls, and the detainee message system). Other areas to be included are: search procedures, contraband policy, visiting rules and regulations, detainee disciplinary policy, sick call procedures (general population and segregation), and the rights and responsibilities of all detainees.

#### Food Service

b2High

b2High Food Service staff should adjust the meal schedule to comply with the prevailing ICE guideline (no more than 14 hours between the evening meal and breakfast the next day). A registered dietitian should conduct a complete nutritional analysis of every master-cycle menu planned. Food Service staff should enforce proper sanitation guidelines. All Styrofoam cups and disposable plastic spoons should be replaced daily or permanently replaced with washable cups and sporks. All detainees assigned as food service workers should be provided protective footwear while at work. Weekly inspections of the food service area should be conducted and documented. Food Service staff should keep all storage areas locked to prevent theft.

#### Detainee Grievance Procedures

The Maverick County Jail should implement detainee grievance procedures based on the ICE standard. Procedures should include: response and appeal time-frames and general guidance, documenting formal grievances in a standard record keeping system, and clearly distinguish minor complaints from formal grievances. Procedures should require staff to forward any grievance concerning staff misconduct to ICE.

#### Access to Medical Care

The Maverick County Jail Plan for Health Services should be revised to replace all references to a "Jail Nurse" with 'Emergency Medical Technician (EMT)' language to accurately reflect current staff credentials. Additionally, care should be exercised to insure that the EMT does not perform tasks that are beyond the scope of his skill or ability.

The Maverick County Jail should establish a procedure to ensure the proper storage and shelf-life tracking of medications. All expired medications should be removed from the working stock and either destroyed or returned to the pharmaceutical provider for a refund.

The dispensary area should present a more sanitary appearance. Daily cleaning of the dispensary should be conducted as outlined in the Section 6.03 of the Maverick County Jail Plan.

A refusal form must be completed whenever a detainee refuses prescribed medical treatment or intervention to include medication refusals. The form should include the risks of refusal of prescribed clinical interventions.

### **Contraband**

Facility managers should develop policy and procedure for handling illegal contraband to include staff inventory, and holding and reporting to the proper authorities for appropriate action. Detainees should receive notice of items they can / not possess.

### **Disciplinary Policy**

Written policy and procedure should be developed to ensure rules of conduct, sanctions, and procedures for violations are defined and communicated to all detainees verbally and in writing. Procedures should be developed to ensure detainee Rights and Responsibilities, Prohibited Acts, Disciplinary Severity Scale, and Sanctions are conspicuously posted in both Spanish and English. As indicated above, this information should be incorporated into the handbook.

### **Emergency Plans**

Policy should be developed which precludes detainees or groups from exercising control or authority over other detainees. Emergency procedures should be amended to include work/food strike, bomb threats, and facility evacuation.

### **Environmental Health and Safety**

The Maverick County Jail should maintain constant inventories for flammable, toxic, and caustic substances in the facility. In addition, Material Safety Data Sheets (MSDSs) should be maintained for each hazardous chemical and an MSDS file should be established which includes a plant diagram of storage areas and a copy of each hazardous chemical in the facility. The plan should also be revised to include requirements for an area-specific diagram conspicuously posted and public posting of emergency plans with accessible building/room floor plans. In addition, written procedures should be established to regulate the handling and disposal of used needles and other sharp objects and a licensed pest control professional should inspect the facility monthly for rodents, insects, and other vermin. The pest control program should include preventive spraying for indigenous insects.

### **Hold Rooms in Detention Facilities**

Hold rooms should contain sufficient seating for the number of detainees held.

### **Key and Lock Control**

Facility staff should establish a comprehensive key and lock accountability system, which includes: procedures that address the issue of compromised keys and locks, a procedure to ensure staff maintains a key accountability system, a master key inventorying system, and procedures for issuing restricted and/or emergency keys. Staff should receive training to handle keys correctly and to report lost, misplaced, or broken keys.

### Population Counts

Policy and procedures should be developed to execute informal and emergency counts.

### Security Inspections

A comprehensive policy concerning security inspections should be developed and Control Center access should be restricted in some way.

### Special Management Unit (Administrative Detention and Disciplinary Segregation)

Facility staff should develop written criteria for placing detainees in Administrative Segregation and Disciplinary Segregation, to include a written order that documents details of such placement and accompanies the detainee to the special housing unit.

### Tool Control

Facility staff should develop a Tool Control policy wherein restricted and non-restricted are defined and tool issuance to staff and detainees is detailed.

### Use of Force

A Use of Force policy should be implemented for use of medication in restraint situations. Policy and procedures should be developed which require medical staff consultation prior to and immediately following a use of force incident. Policy and procedure should be developed to address precautions taken when restraining pregnant detainees.

### Recommended Rating and Justification

This assessment evaluated physical plant capabilities/limitations and the feasibility for safe, secure, and humane confinement of ICE detainees. A presumptive rating of "Acceptable" is recommended contingent upon the submission and approval of an acceptable Plan of Action from the Maverick County Jail to ICE, addressing all RIC Issues and Concerns. With the implementation of suggested noted enhancements it is recommended the Maverick County Jail be utilized by ICE.

### 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 LESS 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	
June 3-4, 2008	

**C. PREVIOUS/MOST RECENT FACILITY REVIEW**

Date[s] of Last Facility Review	
N/A	
Previous Rating	
<input type="checkbox"/>	Superior
<input type="checkbox"/>	Good
<input type="checkbox"/>	Acceptable
<input type="checkbox"/>	Deficient
<input type="checkbox"/>	At-Risk

**D. NAME AND LOCATION OF FACILITY**

Name	
Maverick County Jail	
Address	
Rt3, Box 1033 Hwy 57	
City, State and Zip Code	
Eagle Pass, Texas	
County	
Maverick	
Name and Title of Chief Executive Officer (Warden/OIC/Superintendent)	
Tomas S Herrera, Sheriff	
Telephone Number (Include Area Code)	
830- <span style="background-color: black; color: black;">b6,b7c</span>	
Field Office / Sub-Office (List Office with Oversight)	
San Antonio	
Distance from Field Office	
160	

**E. CREATIVE CORRECTIONS INFORMATION**

Name of Inspector (Last Name, Title and Duty Station)	
<span style="background-color: black; color: black;">b6,b7c</span> / RIC / Creative Corrections	
Name of Team Member / Title / Duty Location	
<span style="background-color: black; color: black;">b6,b7c</span> / Security SME / Creative Corrections	
Name of Team Member / Title / Duty Location	
<span style="background-color: black; color: black;">b6</span> / Food Service SME / Creative Corrections	
Name of Team Member / Title / Duty Location	
<span style="background-color: black; color: black;">b6,b7c</span> / Safety SME / Creative Corrections	
Name of Team Member / Title / Duty Location	
<span style="background-color: black; color: black;">b6</span> / Health Service SME / Creative Corrections	

**F. CDF/IGSA INFORMATION ONLY**

Contract Number	Date of Contract or IGSA
80-99-0219	4-1-07
Basic Rates per Man-Day	
\$51.00	
Other Charges: (If None, Indicate N/A)	
N/A; ; <input type="checkbox"/> N/A	

Estimated Man-days Per Year
78

**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	
1990	
Date Last Remodeled or Upgraded	
2000	
Date New Construction / Bed Space Added	
2000	
Future Construction Planned	
<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	No Date:
Current Bed space	Future Bed Space (# New Beds only)
250	Number: 0 Date: N/A

**J. TOTAL FACILITY POPULATION**

Total Facility Intake for Previous 12 months
5094
Total ICE Man Days for Previous 12 months
78

**K. CLASSIFICATION LEVEL (ICE SPCs AND CDFs ONLY)**

	L-1	L-2	L-3
Adult Male		38	
Adult Female		7	

**L. FACILITY CAPACITY**

	Rated	Operational	Emergency
Adult Male	245	245	N/A
Adult Female	5	5	N/A
<input type="checkbox"/> Facility Holds Juveniles Offenders 16 and Older as Adults			

**M. AVERAGE DAILY POPULATION**

	ICE	USMS	Other
Adult Male	1	150	0
Adult Female	1	0	0

**N. FACILITY STAFFING LEVEL**

Security:	Support:
<span style="background-color: black; color: black;">b2High</span>	

## 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 <sup>1</sup>	Types (Sexual <sup>2</sup> , Physical, etc.)	Physical	Physical	Physical	0
	With Weapon	0	0	0	0
	Without Weapon	11	6	14	0
Assault: Detainee on Staff	Types (Sexual Physical, etc.)	Physical	0	0	0
	With Weapon	0	0	0	0
	Without Weapon	1	0	0	0
Number of Forced Moves, incl. Forced Cell Moves <sup>3</sup>		4	19	1	2
Disturbances <sup>4</sup>		0	2	0	0
Number of Times Chemical Agents Used		0	0	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)	6V	0	8B	2M
	Type (C=Chair, B=Bed, BB=Board, O=Other)	0	1B	0	0
Offender / Detainee Medical Referrals as a Result of Injuries Sustained.		0	0	0	0
Escapes	Attempted	0	0	0	0
	Actual	0	0	0	0
Grievances:	# Received	31	0	7	0
	# Resolved in Favor of Offender/Detainee	31	0	7	0
Deaths	Reason (V=Violent, I=Illness, S=Suicide, A=Attempted Suicide, O=Other)	0	0	0	0
	Number	0	0	0	0
Psychiatric / Medical Referrals	# Medical Cases Referred for Outside Care	9	0	4	0
	# Psychiatric Cases Referred for Outside Care	0	0	0	0

<sup>1</sup> Any attempted physical contact or physical contact that involves two or more offenders

<sup>2</sup> Oral, anal or vaginal penetration or attempted penetration involving at least 2 parties, whether it is consenting or non-consenting

<sup>3</sup> Routine transportation of detainees/offenders is not considered "forced"

<sup>4</sup> 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					
<b>LEGAL ACCESS STANDARDS</b>					1.	2.	3.	4.	5.
1.	Visitation				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.	Telephone Access				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>DETAINEE SERVICES</b>									
3.	Admission and Release				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.	Classification System				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.	Detainee Handbook				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.	Food Service				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.	Funds and Personal Property				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Detainee Grievance Procedures				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9.	Issuance and Exchange of Clothing, Bedding, and Towels				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10.	Religious Practices				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>HEALTH SERVICES</b>									
11.	Medical Care				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12.	Suicide Prevention and Intervention				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>SECURITY AND CONTROL</b>									
13.	Contraband				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14.	Detention Files				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15.	Disciplinary Policy				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16.	Emergency Plans				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17.	Environmental Health and Safety				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18.	Hold Rooms in Detention Facilities				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19.	Key and Lock Control				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20.	Population Counts				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
21.	Security Inspections				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
22.	Special Management Units (Administrative Detention)				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23.	Special Management Units (Disciplinary Segregation)				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
24.	Tool Control				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25.	Transportation (Land management)				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
26.	Use of Force				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
27.	Staff / Detainee Communication (Added August 2003)				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
28.	Detainee Transfer (Added September 2004)				<input checked="" 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)  [REDACTED] b6, b7c	Signature  [REDACTED] b6, b7c
Title & Duty Location  Reviewer in Charge – Creative Corrections	Date  6-5-08

### TEAM MEMBERS

Print Name, Title, & Duty Location  [REDACTED] b6, b7c Security SME, Creative Corrections	Print Name, Title, & Duty Location  [REDACTED] b6 II, Food Service SME, Creative Corrections
Print Name, Title, & Duty Location  [REDACTED] b6 Health Services SME	Print Name, Title, & Duty Location  [REDACTED] b6, b7c Safety SME

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

**COMMENTS:** This assessment evaluated physical plant capabilities/limitations and the feasibility for safe, secure, and humane confinement of ICE detainees. A presumptive rating of "Acceptable" is recommended contingent upon the submission and approval of an acceptable Plan of Action from the Maverick County Jail to ICE, addressing all RIC Issues and Concerns. With the implementation of suggested noted enhancements it is recommended the Maverick County Jail be utilized by ICE. The Maverick County Jail had eight deficient standards cited during this initial review: Detainee Handbook, Food Service, Detainee Grievance Procedures, Contraband, Environmental Health & Safety, Key and Lock Control, Tool Control and Use of Force.

The current handbook fails to identify: the initial issue of clothing and bedding, and personal property; when a medical examination will be conducted; policy when telephone demand is high, direct and free telephone calls, policy and procedures for emergency calls and the detainee message system; facility search procedures and contraband policy; and facility visiting rules and regulations. In addition, the handbook does not describe: the detainee disciplinary policy and procedures; sick call procedures for general population and segregation; and the rights and responsibilities of all detainees

b2High

There is more than a 14-hour lapse time between the last meal served and the first meal of the following day. In addition, a registered dietitian has not conducted a complete nutritional analysis of every master -cycle menu planned.

The satellite-feeding program is not following proper sanitation guidelines. The facility issues Styrofoam cups and disposal plastic spoons to the detainees upon arrival at the jail and these are not being replaced daily. Instead of wearing proper safety shoes or rubber boots, most of the food service workers were observed wearing tennis shoes or shower slippers while working in the kitchen which is a high risk area for potential injuries and slip hazards. Weekly sanitation inspections of all food service areas and equipment is not being conducted. Storage areas in Food Service are not locked to prevent or curb theft.

The Maverick County Jail does not maintain a detainee grievance log or an alternative acceptable record keeping system. Staff are not required to forward any grievance that includes officer misconduct to ICE.

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Maverick County Jail does not have any written procedure for handling illegal contraband; detainees do not receive notice of items they can and cannot have upon admittance.

The Maverick County Jail does not maintain constant inventories for flammable, toxic and caustic substances used/stored in the facility. MSDSs and an MSDS file are not maintained for hazardous substances used at the facility. The fire prevention, control, and evacuation plan fails to require: an area specific exit diagram conspicuously posted in the diagrammed area and public posting of emergency plans with accessible building/room floors. The facility does not have written procedures which regulate the handling and disposal of used needles and other sharp objects. There is no evidence that would indicate monthly inspections and preventive spraying is performed at the facility by a licensed pest control professional.

Facility policy and procedures do not address the issue of compromised keys and locks. The facility does not have a key accountability policy and procedure to ensure key accountability. The County Jail does not maintain any restricted keys for staff issuance with approval by a supervisor. Staff are not trained and held responsible for the adhering to proper procedures for the handling of keys.

The Facility does not have a tool classification system where tools are classified as restricted and non-restricted. The facility does not have procedures for the issuance of tools to staff and detainees.

The facility does not have a use of force policy. There is no policy that addresses medication for restraint purposes. There is no policy to address that medical staff is contacted immediately after a use of force situation. There is no policy or procedure that addresses precautions taken when restraining pregnant detainees.

Maverick County Jail staff were very positive and professional and receptive to making the recommended changes, which would improve their jail operation.

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## MANAGEMENT REVIEW

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The signature below constitutes review of this report and acceptance by the Review Authority. FOD/OIC/CEO will have 30 days from receipt of this report to respond to all findings and recommendations.

HQDRO MANGEMENT REVIEW: (Print Name) b6,b7c	Signature b6,b7c
Title Acting Chief, Detention Standards Compliance Unit	Date 9/15/2008

Final Rating:  **Acceptable**  
 **Deficient**  
 **At-Risk**

Comments: The Review Authority concurs with the "Acceptable" rating based on the approval of the facilities corrective Plan of Action for the deficiencies identified in the Detainee Handbook, Food Service, Detainee Grievance Procedures, Access to Medical Care, Contraband, Disciplinary Policy, Emergency Plans, Environmental Health & Safety, Hold Rooms in Detention Facilities, Key & Lock Control, Population Counts, Security Inspections, Special Management Unit (Administrative Detention and Disciplinary Segregation), Tool Control, and Use of Force standards.